



Strategic Environmental Assessment and Sustainability Appraisal

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

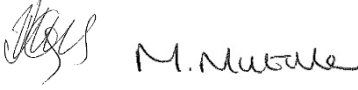


Non-Technical Summary including Post Submission Modifications

Ipswich Borough Council

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Non-Technical Summary including Post Submission Modifications

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OCTOBER 2016 POST SUBMISSION MAIN MODIFICATIONS – SA REPORT ADDENDUM

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

1 INTRODUCTION AND BACKGROUND

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 (referred to hereinafter as the Core Strategy). 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.

The Draft Site Allocations DPD was assessed in 2013 and was subject to informal consultation in early 2014. Public consultation was undertaken on the Draft Core Strategy Focused Review and Draft Site Allocations DPD between January and March 2014. The Core Strategy review was subsequently decided to be a full review. The Site Allocations plan was subsequently amended and subjected to updated Sustainability Appraisal (SA). The Proposed Submission version of the Site Allocations DPD was then consulted upon between December 2014 and March 2015. Following this consultation, a series of proposed modifications to the DPD were identified and consultation took place on these Pre-Submission Main Modifications in October and November 2015. This report presents the **Non-Technical Summary** of the findings of the SA Site Allocations DPD. A full report has also been produced which represents the Sustainability Report for submission under Regulation 22(1)(a) of the Town and Country Planning (Local Plan) (England) Regulations 2012. The full report can be viewed at the Council’s offices at Grafton House, Russell Road, IP1 2DE, at the county library on Northgate Street or on the Council’s website (www.ipswich.gov.uk).

2 WHAT IS SUSTAINABILITY APPRAISAL?

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

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and makes recommendations to help steer its direction to avoid potentially adverse consequences. Consultation with statutory bodies (Natural England, Historic England and Environment Agency) and the public is also required at key stages. Table 2-1 showing the SA stages undertaken alongside the plan-making stages is presented below. It also indicates the timeline and key consultation points.

Table 2-1 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
October 2015 to November 2015	Consultation on Main Modifications following proposed Submission consultation
December 2015	Submission
Spring 2016	Independent examination of Site Allocations DPD by a planning inspector
Autumn 2016	Formal adoption of the Site Allocations DPD

3 SCOPE OF THE APPRAISAL

The scope of the SA was determined through collecting information on the environmental, social and economic characteristics of Ipswich. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies in November 2013.

3.1 Existing characteristics and issues in Ipswich

To ensure that a robust assessment of the Site Allocations DPD is undertaken, it is necessary to understand the existing conditions and characteristics of the Borough, for example, the location of key environmental features like designated historical sites, population dynamics including migration patterns, health, employment, schools capacity and the condition of housing stock and its affordability. These are detailed in the SA Report. Table 3-1 below identifies the sustainability topics covered in the SA and summarises some of the key characteristics and issues under each. This has been updated throughout the process where appropriate.

Table 3-1 Summary of key existing characteristics and issues in Ipswich

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

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

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

3.2 Policy context

A review of other international, national, regional and local plans and environmental protection objectives that could influence the development of the SA and the Site Allocations DPD was undertaken and is recorded in the SA Report. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the SA and the Site Allocations DPD.

3.3 Which aspects of the Local Plan were appraised?

The following aspects of the Site Allocations DPD were appraised through the SA:

- Site Allocations Policies
- Site Allocations
- IP-One Policies
- Opportunity areas

The Policies, Site allocations and Opportunity areas are assessed against 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'*
- ET5: *'To improve access to key services for all sectors of the population'*
- ET6: *'To limit and adapt to climate change'*
- ET7: *'To protect and enhance the quality of water features and resources and reduce the risk of flooding'*
- ET8: *'To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs'*

- ET9: *'To conserve and where appropriate enhance areas and sites of historical importance'*
- ET10: *'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'*
- HW1: *'To improve the health of those most in need'*
- HW2: *'To improve the quality of life where people live and encourage community participation'*
- ER1: *'To reduce poverty and social exclusion'*
- ER2: *'To offer everybody the opportunity for rewarding and satisfying employment'*
- ER3: *'To help meet the housing requirements for the whole community'*
- 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'*
- ER6: *'To encourage efficient patterns of movement in support of economic growth'*
- ER7: *'To encourage and accommodate both indigenous and inward investment'*
- CL1: *'To maintain and improve access to education and skills for both young people and adults'*
- CD1: *'To minimise potential opportunities for crime and anti-social activity'*

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

3.4 Development of the Site Allocations DPD and Consultation

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 3-2 below.

Table 3-2 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	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

Year	Plan Document	SA Comments
		<p>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 DPD and The Preferred Options IP-One Area Action Plan	The decision to combine the two plans was taken through the Council's fifth revision of 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.
October 2014	SA Scoping	<p>Scoping Letter was issued for public consultation from 2nd September to 7th October 2014 to the three statutory consultees (the Environment Agency, Historic England and Natural England) and key stakeholders through the council's website.</p> <p>The consultation comments have been considered and taken into account in the preparation of this SA Report.</p>
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.
December 2015	Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD	Review of proposed modifications from consultation period to the DPD and update of the SA.

4 APPRAISAL OF THE SITE ALLOCATIONS DPD

4.1 Sustainability Appraisal

Site Allocations Policies

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 against the SA Objectives and the conclusions of these are relevant to these policies.

Policy SP1 The protection of allocated sites

This policy safeguards the uses of allocated sites. The policy 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 allocation 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 Habitats Regulations Assessment of the Proposed Submission Site Allocations and Policies DPD (December 2014) identified no likely significant on European sites from the housing sites individually although identified that the cumulative effect of housing development has been assessed through the Habitats Regulations Assessment of the Core Strategy and mitigation measures have been proposed.

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.

Since the SA was undertaken on the sites proposed for employment uses the Council has been involved in the production of the Employment Land Needs Assessment covering Ipswich, Babergh, Mid-Suffolk, Suffolk Coastal and Waveney. The evidence from the business survey, the engagement with agents and discussions with sector leads suggests that Ipswich is likely to require additional land for employment at the key transport nodes and interchanges, including the town centre for financial, professional and other business services. The business survey also highlighted that a good quality environment is also important for firms. Over time, there may well be some movement from existing employment areas to better connected parts of town, which might then be redeveloped. These findings suggest that the conclusions of the SA are correct in terms of the positive impact of the plan upon the economy and employment. The Employment Land Needs Assessment report is anticipated to be published in January 2016.

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 would benefit biodiversity.

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.

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 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 implementation of the policy would benefit HW1 (health), HW2 (quality of life) and ER1 (poverty) as 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).

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.

Site Allocations

A number of site allocations were assessed against each of the SA objectives. The score in the individual assessments vary depending on the location, existing environmental constraints, size of the site allocation and indicative capacity, the proposed use and any opportunities for enhancements. Recommendations to mitigate the significant impacts 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 reductions in CO2 emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L) and meet water efficiency standards of 110 litres/person/day.
- 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.

Ipswich Borough Council has produced a separate Annex to the Sustainability Appraisal which shows how these recommendations have been addressed.

IP-One Policies

The IP-One Policies define areas for development 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**

The findings from the SA showed that all IP-One Policies scored positively against the conservation of soil resources and quality (ET2). Most of the policies scored positively with regard to access due to the fact that regeneration schemes will focus on a number of improvements in the town centre of Ipswich. Although on the whole access will be improved, when looking at air quality (ET1), traffic and its environmental effects (ET4) and climate change (ET6) IP-One Policies SP10, SP11, SP13 and SP14 scored both positively and negatively against SA objectives. 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.

Negative effects are identified with regard to waste for Policies SP10 to SP14 due to retail activities and regeneration of town centre areas which will attract more visitors.

Overall effects against economic SA objectives are likely to be positive as a mix of positive and neutral effects are recorded against these (ER1, ER2, ER3, ER4, ER5, ER6 and ER7). Policies SP11, SP12, SP13 and SP14 seek to provide housing, educational facilities, employment, arts, tourism and cultural facilities within the Waterfront, the Education Quarter 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.

When compared against health the majority of policies scored positively. Improving sustainable accessibility throughout Ipswich will offer direct health benefits related to walking and cycling and indirect benefits some of the policies seek to provide decent housing and improve the overall quality of life. The creation of open space and the regeneration of the Waterfront area will be beneficial to the overall wellbeing and mental health of the residents. Education and skills will be primarily supported through the implementation of policy SP12 through the regeneration and development in the Education Quarter and SP15 through improving the physical access to education facilities.

When looking at the effect schemes had to minimise potential opportunities for crime and anti-social behaviour (CD1) the overall regeneration of the Waterfront, Ipswich Village and 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.

Opportunity Areas

All Opportunity Areas scored positively against key service provision, quality of life, and economic criteria such as poverty, employment, economic growth, viable township and indigenous and inward investment. The Opportunity Areas recognise the importance of protecting and allocating employment, business and retail areas within the town centre, as well as the provision of residential uses. This will ensure that sufficient land and premises will be available to accommodate new businesses. Public realm improvement will also provide an attractive central environment, which may encourage investment.

Mixed scores are recorded against effects on air quality, traffic and climate change. Increased development and car parking spaces within the Opportunity Areas would increase traffic. However, pedestrian and cycling links and improvements are proposed which would contribute partially towards reducing traffic levels within the town centre. These may help encourage people to make more sustainable transport choices in the long term and contribute towards reducing the effects of traffic upon the environment.

The Opportunity Areas largely scored negatively against waste. Opportunity Areas A, B, C, D and E include residential developments, which would increase household waste in the Borough. Other uses in mixed use developments— offices, cafes and restaurants would also produce waste. Opportunity Area F would be mainly offices and leisure uses and is expected to produce office waste.

There are a number of listed buildings in Opportunity Areas A, B, C, D and E, which are also in areas of archaeological importance. There is only one listed building in Opportunity Area F. There is potential for the listed buildings and their setting to be directly affected by new development during construction however development in these areas also has the potential to lead to enhancements. Opportunity Area A refers to enhancing the setting of historic buildings such as Felaw Maltings. Development in Opportunity areas B and C will take account of Scheduled Monuments and archaeology. Opportunity Area B refers to opportunities to reinforce existing historic character. Opportunity Area D refers to developments respecting and enhancing settings of listed and historic buildings.

Opportunity Areas A, B, C, D and E propose residential developments, which would improve the housing stock within the Borough. Good quality housing will indirectly contribute positively to mental health and wellbeing. Opportunity Area F provides for leisure uses, which should have an indirect effect on the health of those using the facilities. However, new developments would increase traffic and affect air quality, which could also have a negative impact on health.

Opportunity Areas A, B, C, D, E and F would make some contribution to the employment objective through providing employment within the Opportunity Areas. Opportunity Areas A, B, C, D and E would contribute to the housing objective through proposals for residential uses within the opportunity areas. Opportunity Area F would not contribute to this objective since it only provides for offices and leisure uses.

Opportunity Areas A, B, C, D, E and F directly support the SA Objective related to vitality and viability of the town centre. These opportunity areas will provide a focus for community facilities and higher density housing development which would contribute to the vitality of these areas as well as the town centre.

Opportunity Area D supports this education and skills objective by providing for land for educational uses and support facilities.

Cumulative Effects

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).

The assessment of the policies has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed. This is important as none of the policies would ever be implemented in isolation and the plan has to be read as a whole. The Local Plan has been assessed for its individual effects but there may be cumulative effects which could occur as a result of the policies being implemented.

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

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

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

Potential positive cumulative effects include the following:

- Education provision and educational attainment
- Health and well-being
- Housing
- Sustainable economic growth

A combination of potential positive and adverse cumulative effects include:

- Climate Change, air quality, energy efficiency and natural resources
- Access to services
- Biodiversity – the protection of designated sites
- Landscape and Townscape
- Water resources
- Crime and fear of crime

4.2 Alternatives Considered

Alternative Vision and Objectives

The Core Strategy vision and objectives provide the context for the Site Allocations DPD. The Proposed Submission Site Allocations and Policies DPD does not present alternative vision or

objectives as these are contained within the Core Strategy DPD. As such, no alternative visions or objectives were assessed.

Alternative Policies

An option representing a 'No Plan' / '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.

In the absence of the plan, 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 the plan 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.

In the absence of the plan, 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 plan in place would mean not planning in comprehensive manner to alleviate problems in the area. Consequently, a plan is being produced in order to provide greater certainty and direction in a coordinated manner.

Alternative Site Allocations

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. 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

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

The discounted sites are considered unreasonable alternatives therefore no further SA of their allocation was undertaken.

A high-level assessment of alternative uses of the selected sites was undertaken in December 2013. 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 since changed from a housing allocation to employment.

5 MONITORING

Monitoring is an ongoing process, integral to the implementation of the DPD and a requirement of the SA process. The proposed monitoring framework was designed to focus mainly on significant sustainability effects identified during the SA, including effects:

- 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.

A monitoring framework is presented in the full SA Report which identifies the factors that should be monitored along with the relevant key performance indicators. Monitoring should occur throughout the lifetime of the Site Allocations DPD.