



Strategic Environmental Assessment and Sustainability Appraisal

Core Strategy and Policies DPD Review

SA Report

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Ipswich Borough Council

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SA Report

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Report No 001-UA006314-EEA-03-F

Date 4 December 2015

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ABBREVIATIONS

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

1 INTRODUCTION

1.1 Overview

The overarching strategic framework for development in Ipswich to 2027 is set out within the Core Strategy and Policies Development Plan Document (DPD) which was formally adopted on 14th December 2011.

Following the initiation of a focussed review of the adopted Core Strategy in 2013 (which provided updated housing and employment numbers, along with proposing to bring forward development at the Garden Suburb sooner) it was determined that the extent of changes amounted to a whole plan review. Therefore this reviewed Core Strategy and Policies DPD (hereafter referred to as the 'Core Strategy') will ultimately replace the current adopted Core Strategy and Policies DPD. The Proposed Submission version of this reviewed Core Strategy was consulted upon between December 2014 and March 2015. Following this consultation, a series of proposed modifications to the DPD were identified and consultation took place on these Pre-Submission Main Modifications in autumn 2015. Together the Proposed Submission Core Strategy and the Pre-Submission Main Modifications represent the plan submitted for Examination under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This emerging Core Strategy together with the emerging Site Allocations (incorporating IP-One Area Action Plan) DPD (hereafter referred to as the Site Allocations DPD) will provide the new 'Local Plan' / statutory development plan for Ipswich up to 2031.

As part of the preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken. Hereafter the term SA has been used in this report when referring to the combined SA/SEA process. The SA has also been updated during the whole plan review and subsequent modifications process. This report presents the process and up-to-date findings of the SA of the new Submission Core Strategy. This report is the Sustainability Report submitted under Regulation 22(1)(a) of the above 2012 Regulations.

1.2 Further Background to and Purpose of the Core Strategy and SA Report

As stated above, the Core Strategy sets out the strategy for future development in Ipswich to 2031. It indicates broadly how and where the Borough will accommodate development to meet needs identified through the evidence base. It also explains how it will ensure this is done in a sustainable way. It contains detailed policies to deliver and manage development in Ipswich. Proposed development will be assessed against all relevant policies contained within the Core Strategy along with those in the Site Allocations (Incorporating IP-One Area Action Plan) DPD and any other relevant adopted plans.

An SA was undertaken for the Draft Submission Core Strategy and Policies in 2009 by Suffolk County Council and the Core Strategy was subsequently adopted in 2011. In October 2013 Ipswich Borough Council consulted upon the scope of SA for a Focused Review of the adopted Core Strategy. Subsequently an interim SA Report was prepared and consulted upon in January 2014 alongside the Draft Core Strategy and Policies Focussed Review document.

In August 2014 it was determined that the extent of the changes in the Core Strategy represented the need for a whole plan review rather than a focussed review. One of the key changes that resulted was that a number of general development management (DM) policies were consolidated into Part C of the Core Strategy rather than being included within the Site Allocations DPD.

Therefore, an SA Scoping letter was issued for consultation in September 2014 to the three statutory bodies and other relevant organisations and published on Ipswich Borough Council's website to provide an update to the scope and approach to SA. This was followed by the updating of the SA for the Core Strategy to reflect the changes brought about by the review. This Proposed Submission Core Strategy and Policies DPD Review and accompanying SA Report was consulted upon between 12th December 2014 and 5th March 2015.

Following this consultation, a series of proposed modifications to the DPD were identified. These were categorised as either Pre-Submission Main Modifications or Pre-Submission Additional Modifications. The SA report was revisited to ascertain whether the Pre-Submission Main Modifications affected the results of the SA and an addendum to the earlier report was produced. Consultation took place on the Pre-Submission Main Modifications and the SA addendum between 9th October 2015 and 23rd November 2015.

This report represents one consolidated SA report for submission under Regulation 22(1)(a) of the 2012 Regulations. It combines the Proposed Submission SA report and the Pre-Submission Main Modifications SA Report Addendum within one document. This SA Report provides a summary of the SA process and presents the findings and recommendations of the assessment of the Core Strategy. A separate SA Report has been produced in relation to the Proposed Submission Site Allocations DPD.

Comments received at the Scoping stages and on the previous Core Strategy SA Reports have been considered throughout the process. Further details are provided in Appendix C. Comments received in relation to the SA at Proposed Submission stage will be submitted to the Planning Inspectorate as part of the Examination process. Further comments received on the SA in relation to the Pre-Submission Main Modifications will also be submitted for Examination.

The Core Strategy along with this SA Report and associated appendices will be submitted for Examination in December 2015 along with all duly made comments received during the Proposed Submission (December 2014 – March 2015) and Pre-Submission Main Modifications (October – November 2015) consultations.

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

1.3 Structure of this SA Report

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

Table 1-1 Contents and Structure of this SA Report

Section of SA Report	Outline Content
Abbreviations	Abbreviations used in this report.
1: Introduction	Provides the background to, purpose of, and structure of the Core Strategy and this SA Report.
2: The Core Strategy and Policies DPD	Provides an overview of the contents of the Core Strategy and Policies DPD.
3: Sustainability Appraisal	This section outlines the legal requirements for the SA. It outlines the key elements of the SA process and the approach adopted for appraising the effects of the Core Strategy (including the SA Framework), together with an overview of the consultation requirements.

Section of SA Report	Outline Content
4: Appraisal of the Core Strategy and its Alternatives	Presents a summary of the SA of the Core Strategy including its alternatives against the SA Framework. This section also outlines any recommendations suggested to improve the sustainability performance of the policies against the SA Framework.
5: Cumulative Effects and Significant Effects	Presents a summary of the potential cumulative and significant effects that may arise as a result of the Core Strategy.
6: Monitoring Framework	Provides a draft monitoring framework to monitor identified significant effects identified through the SA.
7: 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	Provides a review of relevant plans programmes and environmental protection objectives.
Appendix B	Provides a summary of the baseline conditions within the borough. It also identified current issues and opportunities.
Appendix C	Outlines a summary of the consultation responses received and how they were taken on board in the SA.
Appendix D	SA matrices for the Core Strategy policies
Appendix E	SA matrices for the Development Management policies.
Appendix F	2013 Focussed Review Alternative Assessment
<i>Appendix G (available upon request)</i>	<i>Provides an extract of relevant plans, programmes and protection objectives along with baseline data for Suffolk Coastal. Taken from the Suffolk Coastal District Council - Sustainability Appraisal Scoping Report Site Allocations and Area Specific Policies DPD and Felixstowe Peninsula AAP - November 2014</i>
<i>Appendix H (available upon request)</i>	<i>Provides an extract of relevant plans, programmes and protection objectives along with baseline data for Mid Suffolk and Babergh. Taken from the Babergh District Council and Mid-Suffolk District Council Development Management Policies and Strategic Site Allocations Joint Sustainability Appraisal – Scoping Report – June 2014.</i>
Appendix I	Pre-Submission Main Modifications for Public Consultation and Pre-Submission Additional Modifications.

The Core Strategy and Policies DPD forms part of the Ipswich Local Plan. It covers three areas of policy:

- It sets out a strategic vision and objectives to guide the development of the town;
- It promotes the spatial strategy for the development of the borough to 2031 through strategic policies; and
- It provides a suite of policies to control, manage and guide development across the borough.

The Core Strategy includes a vision, 12 Strategic Objectives, 20 Core Strategy Policies and 34 Development Management Policies. These are outlined below:

Our **Vision** is to improve the quality of life, health and well-being for all who live in, work in, learn in and visit Ipswich, by supporting growth and ensuring that development happens in a sustainable manner so that the amenities enjoyed by local people are not harmed and the town is enhanced.

As a result, by 2031 Ipswich will be a more vibrant, active and attractive modern county town successfully combining modern development with conserving and enhancing its historic character - a true focus for Suffolk and beyond. It will be a place where people aspire to live, work, learn, visit and invest - and it will have a reduced carbon footprint. In spatial terms:

- a There will be more people living and working in Ipswich town centre, which will be the focus for much of the new development including continued development at the Ipswich Waterfront.
- b People will enjoy an extended and improved shopping centre that includes new stores on allocated sites, providing greater choice than at present, and improved cultural and sporting opportunities within the wider centre.
- c Pedestrian links between the central shopping area and the Waterfront, Village, Education Quarter and railway station will be direct, attractive, safe and well signed.
- d Pedestrians, cyclists and public transport users will come first in Ipswich town centre. Traffic management measures in conjunction with improvements for pedestrians, cyclists and buses will ensure effective links between the wider Ipswich area and the town centre, and help keep congestion down and accessibility easy in the centre. Additional short stay parking and enhanced park and ride will provide for car-borne shoppers, visitors and the workforce.
- e The distinctive network of beautiful parks and open spaces, green infrastructure and open water will be enhanced by the completion of the river path, improved ecological network and additional tree canopy cover and landscaping in new developments surrounding areas and on the streets.
- f As well as the concentration of jobs in the town centre, there will be new employment development at sites around the Borough including a strategic employment site at Futura Park, together with the continued development of existing employment areas distributed across the town.
- g University Campus Suffolk will have continued its planned growth, to complete the new campus at the Waterfront and the adjacent Education Quarter.
- h The town's health will be cared for through strategic health services brought together at the Heath Road Hospital site and a strong network of local surgeries and health centres, including replacement or additional provision for Deben Road surgery.
- i During the plan period, land will start to come forward for development at the Ipswich Garden Suburb, in conjunction with highway, water, energy, education, green and health

infrastructure. Express bus services and pedestrian and cycle routes will connect the area to the town centre

- j Outside central Ipswich, thriving district and local centres will provide local shopping and services close to people's homes and will be surrounded by strong and cohesive communities.

The twelve strategic objectives that will guide the Core Strategy include:

- 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.

The 20 Core Strategy Policies include:

- Policy CS1: Sustainable Development - Climate Change
- Policy CS2: The Location and Nature of Development
- Policy CS3: IP-One Area Action Plan
- Policy CS4: Protecting our Assets
- Policy CS5: Improving Accessibility
- Policy CS6: The Ipswich Policy Area
- Policy CS7: The Amount of Housing Required
- Policy CS8: The Balance between Flats and Houses
- Policy CS9: Previously Developed Land
- Policy CS10: Ipswich Garden Suburb
- Policy CS11: Gypsy and Traveller Accommodation
- Policy CS12: Affordable Housing
- Policy CS13: Planning for Jobs Growth
- Policy CS14: Retail Development and Main Town Centre Uses
- Policy CS15: Education Provision
- Policy CS16: Green Infrastructure, Sport and Recreation
- Policy CS17: Delivering Infrastructure
- Policy CS18: Strategic Flood Defence
- Policy CS19: Provision of Health Services
- Policy CS20: Key Transport Proposals

The 29 Development Management Policies include:

- Policy DM1: Sustainable Design and Construction
- Policy DM2: Decentralised Renewable or Low Carbon Energy
- Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments
- Policy DM4: Development and Flood Risk
- Policy DM5: Design and Character
- Policy DM6: Tall Buildings
- Policy DM8: Heritage Assets and Conservation
- Policy DM9: Buildings of Townscape Interest
- Policy DM10: Protection of Trees and Hedgerows

- Policy DM12: Extensions to Dwellinghouses and Provision of Ancillary Buildings
- Policy DM13: Small Scale Infill and Backland Residential Developments
- Policy DM14: The Subdivision of Family Dwellings
- Policy DM17: Transport and Access in New Developments
- Policy DM18: Car and Cycle Parking
- Policy DM20: The Central Shopping Area
- Policy DM21: District and Local Centres
- Policy DM22: Town Centre Uses Outside the Central Shopping Area
- Policy DM23: Retail Proposals Outside Defined Centres
- Policy DM24: Affordable Housing
- Policy DM25: Protection of Employment Land
- Policy DM26: Protection of Amenity
- Policy DM27: Non-residential Uses in Residential Areas
- Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities
- Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities
- Policy DM30: The Density of Residential Development
- Policy DM31: The Natural Environment
- Policy DM32: Protection and Provision of Community Facilities
- Policy DM33: Green Corridors
- Policy DM34: Countryside

The Core Strategy also includes two non-policy based areas. Firstly a section on the context to the whole document which explains, amongst other things, the planning system, the New Anglia Local Enterprise Partnership, the Duty to Co-operate, and an explanation as to how all Ipswich's planning documents fit together. It also paints a picture of Ipswich in terms of its geography, history and character and provides some facts about Ipswich as a place (Part A). Secondly, there is a section on implementation, targets and monitoring proposals (Part D).

3 SUSTAINABILITY APPRAISAL

3.1 Stages in the SA Process

Although there are formalised approaches for both SA and SEA, only the latter has a legal obligation to perform certain activities as stipulated in the SEA Directive. These legal obligations have been adhered to throughout the SA process by following a series of prescribed stages, through which the elements of the Core Strategy have been appraised using SA Objectives (Table 3-2 provides further detail)¹.

Table 3-1 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 3-1 Stages in the SA Process and SEA Directive Requirements

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
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 preparation”</i> (Annex 1(e))	Chapter 2 and Appendix A.	Stage A corresponds to the scoping stage of the SA and the findings of this stage are presented in the Scoping Report and subsequent Scoping Letter that was consulted upon in October / November 2013 and September 2014 respectively. During these stages the scope of the SA for the Core Strategy was defined. The policies, plans and programmes review and the baseline have been updated in this Submission SA report.
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”</i> and, <i>“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	
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</i>	N/A	

¹ Planning Practice Guidance ‘Strategic environmental assessment and sustainability appraisal’ 2014 and www.pas.gov.uk

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
	<i>information which must be included in the environmental report.(Article 5.4)</i>		
Stage B: Developing and Refining Options and Assessing Effects			
B1: Testing the Core Strategy's objectives against the SA Framework	The Environment Report should consider “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and give “an outline of the reasons for selecting the alternatives dealt with” (Article 5.1 and Annex I(h))	Chapter 3	Stage B of the SEA process is linked to the overall production of the Core Strategy which includes the development of plan options and the selection of the preferred options. There has been a considerable degree of interaction between the plan-making and SA teams during this stage in the process. This has enabled potential adverse effects of the Core Strategy to be avoided/minimised and potential sustainability benefits maximised.
B2: Developing the Core Strategy Options	In the Environmental Report, “the likely significant effects on the environment of implementing the plan or programme ... and reasonable alternatives ... are [to be] identified, described and evaluated” (Article 5.1)		
B3: Predicting the effects of the Core Strategy			
B4: Evaluating the effects of the Core Strategy			
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	Annex I (g) states that it should also include “measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme...”		
B6: Proposing measures to monitor the significant effects of implementing the Core Strategy	The Environmental Report should provide information on “a description of the measures envisaged concerning monitoring” (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 “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..” (Article 5.2). Details of the information to be given in the Environmental Report are provided in Annex 1.	This SA Report represents the required Stage C output.	This SA Report has been produced in line with the requirements of the SEA Directive for producing an Environmental Report. A Non-Technical Summary is also provided.
Stage D: Consultation on the Core Strategy and the SA Report			
D1: Public participation on the proposed	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		The SA Report and the Core Strategy was consulted upon in accordance with Regulation 19 of the Town and Country

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
submission documents	should be given an ‘ <i>early and effective opportunity within time frames to express their opinions</i> ’ (Article 6.2).		Planning (Local Planning) (England) Regulations 2012.
D2: Appraising significant changes resulting from representations	N/A	N/A	Following the receipt of representations after the draft Core Strategy consultation (January – March 2014) and the Proposed Submission Core Strategy (December 2014 – March 2015) changes were proposed to the Core Strategy. The SA Report was updated to reflect these changes and comments received in relation to the SA itself. The Submission SA report relates to the Proposed Submission Core Strategy along with Pre-Submission Main Modifications [See Chapter 1 for further details about the evolution of the SA].
D3: Making decisions and providing information			
Stage E: Monitoring the significant effects of implementing the Core Strategy			
E1: Finalising aims and methods for 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)		Monitoring undertaken for the SA process will be reported through the Authority Monitoring Report (AMR).
E2: Responding to adverse effects			

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

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

3.2.1 Review of Plans, Policies and Environmental Protection Objectives

The following box 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))

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

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

The review included documents prepared at international, national, regional and local scale (within Ipswich). As part of the SA process consideration has also been given to plans relevant to local authority areas adjoining Ipswich due to the potential implications of the Core Strategy in relation to adjoining areas (particularly relevant to Policies CS2 and CS7 discussed later in this SA Report). This also reflects guidance contained in the Planning Practice Guidance which states *'The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities.'*² The latest Scoping Report produced for Suffolk Coastal is available at <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/sustainability-appraisal/> and for Mid Suffolk and Babergh is available at <http://www.midsuffolk.gov.uk/assets/UploadsMSDC/Economy/Strategic-Planning-Policy/LDF/DPDs/Dm-Allocations-SEA-SR.pdf>. A PDF of these documents can be provided upon request as Appendices G and H of this report.

The review of plans and programmes has been updated as part of the production of the Submission SA report. It is considered that the issues identified remain relevant.

International Plans and Programmes

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

² Reference ID: 11-016-20140306

National Plans and Programmes

A review was undertaken of relevant White Papers, plans and strategies. One of the most important documents reviewed was the UK Sustainable Development Strategy³ which outlines the over-arching Government objective to raise the quality of life in our communities.

Central Government establishes the broad planning guidelines and policies for a variety of different topics which are now brought together in the National Planning Policy Framework (NPPF). The NPPF streamlines former national planning policy into a consolidated set of priorities to consider when planning for and deciding on new development.

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.

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.

Strategic Plans

A wealth of different plans and strategies have been produced at the regional (East Anglia/East of England) and county (Suffolk) level covering a variety of topics including; housing; economic development and performance; climate change (including flood risk); renewable energy; innovation; rural development; waste management; accessibility; equality and diversity; health; waste; cultural provision and diversity; and physical activity. All of the objectives of these plans as well as some of the challenges they raise need to be taken on board and driven forward by the borough as appropriate. However, it must be noted that the overarching goals of some of these plans and strategies may be outside the remit of the Core Strategy which forms only an

³ UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)

individual part of a number of different vehicles trying to deliver regional and sub- regional targets.

The Localism Act was granted Royal Assent on 15th November 2011. This Act seeks to rescind some regional planning documents, and as such, the East of England Plan (Regional Spatial Strategy) (2008) has been revoked.

Local Policy

Plans produced at the local level specifically address issues relating to the economy; health; safety; tourism; sustainable communities; housing; employment; and physical activity. The Core Strategy and the SA should draw from these documents and transpose their aims in their policies and proposals. These plans should in theory have included the main influences of international, national, regional and county level plans through the 'trickle-down effect'. They should also provide more of a local focus for the Borough. It is, through identifying these themes and incorporating them into the DPD that synergies can be achieved with other relevant documents.

Key Results from the Review

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 Areas of Conservation (SACs), 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.

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.

3.2.2 The Sustainability Baseline and Key Sustainability Issues

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

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

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

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

- Review of relevant local, regional and national plans, strategies and programmes;
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape). This was also based on advice in Planning Practice Guidance '*Strategic environmental assessment and sustainability appraisal*' 2014, www.pas.gov.uk guidance and previous consultation recommendations from other SAs. 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. The baseline data gathered for SA purposes for plans relating to Babergh, Mid-Suffolk and Suffolk Coastal authority areas has also been considered as part of the SA process. As with the review of relevant plans and programmes this is particularly relevant to policies CS2 and CS7, as discussed later in this report. This also reflects guidance contained in the Planning Practice Guidance which states 'The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities.'⁴,

A detailed description of the baseline characteristics of Ipswich is provided in Appendix B. The latest Scoping Report produced for Suffolk Coastal is available at <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/sustainability-appraisal/> and for Mid Suffolk and Babergh is available at <http://www.midsuffolk.gov.uk/assets/UploadsMSDC/Economy/Strategic-Planning-Policy/LDF/DPDs/Dm-Allocations-SEA-SR.pdf>. A PDF of these documents can be provided upon request as Appendices G and H of this report

The baseline has been updated where possible for this Submission SA Report. The issues identified remain relevant.

Key Sustainability Issues and Opportunities

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 3-2. Although issues / opportunities have been grouped by broad sustainability theme, many are indirectly or directly linked and therefore closely related.

⁴ Reference ID: 11-016-20140306

Table 3-2 Summary of Key Sustainability Issues and Opportunities

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.</p> <p>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.</p> <p>Services need to consider the diverse and comparatively young population with parent and child friendly services.</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>9 wards have LSOAs that fall within the bottom 20% most deprived for education, skills and training. These are, Rushmere, Gipping, Stoke Park, Bridge, Whitehouse, Alexandra, Sprites, Castle Hill and Gainsborough.</p>	<p>There is a need to improve educational attainment in the Borough. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
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>The proportion of live births with low birthweight in 2012 was 6.7%. This was lower than that for 2011 (6.8%), and was greater than that for 2004 (6.2%). The proportion of live births with low birthweight in 2012 was the same as the proportion in the East of England region (6.7%) and lower than the England figure (7.0%).</p> <p>Levels of teenage pregnancy are higher than regional and national levels and have implications for health service provision, housing and educational attainment, however levels have shown a decline since 2007.</p> <p>Alexandra, Westgate, Whitton, Gainsborough, Gipping and Stokes Park wards all have LSOAs within 20% of the most deprived for health deprivation and disability.</p> <p>There is a need to reduce social isolation and promote physical participation to promote health and wellbeing with all the residents of Ipswich, but particularly those over 50 and children.</p>	<p>There are opportunities to improve the health of the Borough through the provision of new homes as there are links between the supply of decent housing and health.</p> <p>Health improvements would also benefit the local economy and would enhance overall quality of life in the Borough.</p> <p>Opportunities should also be sought to encourage walking and cycling.</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 risk of flooding to new development and existing properties should be supported.</p>	<p>New developments and households within the Borough should be encouraged to minimise water use and to re-use rainwater where possible i.e. grey water recycling systems. Discussions regarding water resources availability for new developments should be undertaken with Anglian Water.</p> <p>Areas at risk from flooding should be protected from development that would increase that risk. New development should be encouraged to use Sustainable Drainage Systems (SuDS) to manage runoff, further reduce flood risk and help protect groundwater and surface water quality.</p> <p>It should be ensured that groundwater quality is protected particularly during any construction works.</p> <p>The sustainable use of water resources should be supported.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
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>Where appropriate, opportunities should be sought to implement appropriate remediation and verification measures of contaminated land.</p> <p>Soil resources should be protected and development should continue on brownfield sites.</p>
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.</p> <p>The air quality impacts of additional traffic within Ipswich on the AQMAs and other areas of high NO₂ levels must be assessed and monitored and strategies for limiting adverse impacts on air quality identified.</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>New development should be encouraged to use SuDS to manage runoff and further reduce flood risk (particularly as some new development would be situated on previously undeveloped land). Delivery of the Ipswich tidal flood defences will also help to reduce flood risk.</p> <p>New developments should be encouraged to include sustainable design principles, energy efficiency and the incorporation of renewables e.g. the inclusion of solar panels and low carbon technologies. The carbon footprint of new development should be reduced.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
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 20 County Wildlife Sites (CWS) within Ipswich (See Map 1 Sites of Ecological Importance).</p> <p>There is one area of ancient and semi-natural woodland along with ancient replanted woodland to the south of the Borough.</p>	<p>Development proposals should maximise opportunities to protect and enhance habitats and where appropriate create new habitats in order to deliver the biodiversity objectives of the relevant Biodiversity Action Plans (BAPs).</p> <p>Opportunities should be sought to develop and enhance the network of public open space.</p>
Cultural Heritage	<p>Ipswich is home to a wealth of heritage assets including those of a national and local importance.</p> <p>There are over 600 Listed Buildings, of which 11 are Grade I and 25 are Grade II*. There are ten Scheduled Ancient Monuments and 15 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.</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 it is important to maintain the gap between Ipswich and adjacent villages to preserve local distinctiveness.</p> <p>Opportunities should be sought to promote local character and distinctiveness where possible to encourage new residents.</p>
Minerals and Waste	<p>There are a number of waste facilities within the Borough, including, a household waste and recycling centre, a composting site and facilities for metal / end of life vehicles (not inclusive). In addition, an energy from waste incinerator is 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>Opportunities should be sought to enhance recycling and composting performance.</p> <p>Sustainable sourcing and waste management principles should be promoted for all new development within Ipswich.</p>

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>Opportunities should be sought to reduce dependence on the private car and increase public transport use.</p> <p>It will be important to ensure that new development can be easily accessed by public transport.</p> <p>The cycling and walking network within the Borough should be expanded and enhanced.</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>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 and the Borough has higher numbers of people claiming benefits than county and national indicators suggest (2010).</p> <p>The factors restricting economic growth in Suffolk in general are a lack of qualified staff and poor broadband; as well as a lack of customers, transport links, and poor quality premises (Suffolk Growth Strategy).</p>	<p>The economy in Ipswich needs to be diversified to broaden the economic base as the key economic sectors are identified primarily in the service sector, e.g. distribution, public administration, etc.</p> <p>The good transport links in the Borough should be exploited as accessibility is a key issue when encouraging new residents.</p> <p>There is a need to retain skilled workers and improve skills levels amongst the workforce.</p> <p>There are opportunities to attract private sector interest in the town to service and provide more opportunities for existing and new communities, such as more and better shops to enhance the high street, and a focus on stalled developments.</p>

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. 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 safety by design principles into new development and ensuring appropriate housing mixes are adopted. In addition, generally providing improved employment and educational opportunities for the local population could also contribute to improve crime rates.</p> <p>Access to sports facilities should be enhanced. This could have associated health benefits.</p>

Housing	<p>Housing costs are relatively low but have gradually increased in recent years.</p> <p>Median house price (July 2013) in Ipswich is £150,000, which shows an increase of 7.1% from the median price of the same time the previous year (£140,000). The average house price is lower than Suffolk (£167,000 in July 2013) and lower than that in the East of England (£178,000 August 2013 – ONS). House prices have gradually increased but incomes have not matched this rate of growth, which may lead to problems of housing affordability.</p> <p>The affordability of purchased homes in 2011 was a ratio of 5:7 which was less than the affordability for Suffolk 6:9, the East of England 7:6 and England 6:5 (Office for National Statistics Local Profiles).</p> <p>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.</p> <p>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 averaged 653 p.a. April 2001 to March 2012. Completions peaked in 2007-08 but fell since then in line with the downturn and subsequent recession. Completions in 2014/15 were 411.</p> <p>The Strategic Housing Marketing Assessment 2008 which has further been updated in 2012 found there is a need for smaller one to two bedroomed homes in Ipswich to meet the needs of smaller households and an ageing population, as well as a continued need for smaller two to three bedroomed family homes. Much of recent housing development in Ipswich, however, has been in the form of one and two bedroomed apartments and in the present economic climate there is an oversupply of flats.</p> <p>There are 972 vacant homes in Ipswich (2014), a decrease from 1,750 in 2011/12.</p>	<p>Housing regeneration efforts present a significant opportunity both to revitalise the housing stock, address deprivation and to improve quality of life.</p> <p>Development within the Borough provides opportunities to meet housing needs, particularly for family housing and to counter balance the provision of flats within Ipswich town centre.</p>
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SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
	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.	

3.2.3 The SA Framework

Background to the SA Framework

The SA Framework underpins the assessment methodology and comprises a series of SA 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 SA Objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The SA Objectives are separate from the Core Strategy 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 SA Objectives

The SA Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issues and opportunities. They were originally agreed in 2006 during the initial SA Scoping for Ipswich's Core Strategy. Twenty two SA Objectives were identified and the assessment showed that their compatibility with the twelve plan objectives was high with every sustainability objective having at least one plan objective positively compatible.

The SA Objectives have since been reviewed and modified to reflect the requirements of the new Core Strategy. Original SA Objectives ET8 and ET11 have since been merged, therefore there are 21 SA Objectives.

Table 3-3 presents the SA Objectives that were used in the assessment of the Core Strategy and its alternatives. Each of the SA Objectives is supported by a series of Sub-Objectives and indicators to add further clarity and to assist the assessment process. As the SA process progresses, indicators and where appropriate, targets were developed to assist the assessment.

Table 3-3 The SA Framework

SA Objective		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? 	ET1a. Number and distribution of AQMAs ET1b. Exceedances of the annual average objective level for Nitrogen Dioxide in the AQMAs Air Quality Archive Ipswich Borough Council
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? 	ET2a. Area of contaminated land returned to beneficial use ET2b. Density of new development ET2c. Amount (ha) of previously developed land available Ipswich Borough Council Office for National Statistics (ONS) Department for Communities and Local Government
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? 	ET3a. Tonnage of household waste produced and recycled ET3b. Location and number of waste facilities serving the Borough ET3c. Amount of household waste collected per household Defra Suffolk County Council
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? 	ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes ET4b. Journey to work by mode Ipswich Borough Council 2001 and 2011 Census

SA Objective			SA Indicator	Source
ET5	To improve access to key services 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>	<p>Ipswich Borough Council</p> <p>www.communities.gov.uk</p>
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			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>Historic England</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 accessibility standard M4(2)</p>	<p>Ipswich Borough Council</p>

SA Objective			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? 	HW1a. Proportion of population with access to hospital / GP / Dentist HW1b. Proportion of journeys to work by foot or by bicycle HW1c. How children travel to school (Quality of Life Indicators (Government indicators) / Best Value Performance Indicators (Ipswich Borough Council) HW1d. Levels of physical activity data HW1e. Number of GP registrations for depression	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? 	HW2a. Play and open space quality, quantity and accessibility HW2b. Percentage of residents who are happy with their neighbourhood as a place to live (Place Survey) HW2c. Number of noise and light pollution complaints	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? Would the proposals benefit LSOAs that exhibit high levels of deprivation? 	ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country ER1b. Provision of childcare	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? 	ER2a. Working age unemployment ER2b. Employment by occupation ER2c. Youth unemployment data ER2d. Long term unemployment data ER2e. Average wage data	ONS / National Online Manpower Information System (NOMIS) Ipswich Borough Council www.communities.gov.uk

SA Objective			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? 	ER3a. Number of new dwellings completed in Ipswich including affordable housing ER3b. Percentage split of dwelling types ER3c. Average house price ER3d. Number of people presenting themselves as homeless.	Suffolk Observatory ONS Ipswich Borough Council
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? 	ER4a. Planning consents for employment uses ER4b Take up of employment land ER4c Population in Employment	Ipswich Borough Council (Monitoring reports) ONS – Nomis www.nomisweb.co.uk
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? 	ER5a. No. / Percentage of vacant retail units ER5b. Commercial / retail rental data ER5c Percentage of new retail floorspace developed within defined centres.	Ipswich Borough Council www.communities.gov.uk

SA Objective			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? 	ER6a No. / percentage of people working from home ER6b Waiting times at junctions in Ipswich See also ET4a (employment land take up) and HW1b (journey to work)	Ipswich Borough Council Suffolk County Council
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? 	ER7a. Business start-ups and closures ER7b. No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site ER7c. Employment land availability	Ipswich Borough Council Suffolk County Council
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? 	CL1a. GCSE Attainment Levels (Grades A*-C) CL1b. Proportion of the population with no qualifications	ONS www.communities.gov.uk

SA Objective			SA Indicator	Source
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 safety 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>

3.2.4 Internal SA Objective Compatibility

The 21 SA Objectives have been tested against each other to identify any potential areas of internal incompatibility. The results are presented in Table 3-4 and summarised below.

Generally the SA Objectives were either compatible or no clear impacts between the objectives could be established. However, some uncertainties were identified. Compatibility was assessed as uncertain between SA Objective ER3 'To help meet the housing requirements for the whole community' and the following SA Objectives:

- ET1: *'To improve air quality'*
- ET2: *'To conserve soil resources and quality'*
- ET3: *'To reduce waste'*
- ET4: *'To reduce the effects of traffic upon the environment'*
- ET6: *'To limit and adapt to climate change'*
- ET7: *'To protect and enhance the quality of water features and resources and reduce the risk of flooding'*
- ET8: *'To conserve and enhance biodiversity and geodiversity including favourable conditions on SSSIs, SPAs and SACs'*
- ET9: *'To conserve and where appropriate enhance areas and sites of historical importance'*
- ET10: *'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'*

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.

There could also be an increase of traffic during the construction / operation of new residential development associated with an increase of inhabitants and their future transport requirements therefore this could affect local air quality and climate change.

Comments received in relation to the Proposed Submission SA Report suggested that potential negative effects had not been sufficiently identified through the assessment of SA objectives. Generally the SA Objectives were either compatible or no clear impacts between the objectives could be established. However, some uncertainties were identified. It should be emphasised that this is an assessment of the SA objectives against each other, without considering any potential effects of the plan. Therefore it is not correct to amend the assessment in light of the subsequent assessment of Policy CS10 Ipswich Garden Suburb, for example, as the same objectives need to be applied equally to all aspects of the DPD and the proposals within it. For example, whilst meeting the housing requirements for the whole community promoted in SA Objective ER3 could result in conflicts with other objectives relating to, for example traffic growth for some developments, it is not inevitable, although probable, at this stage of the SA that this will be the case for all and therefore the assessment of uncertain against this objective is still applicable. Similarly, some of these uncertainties could be addressed through mitigation measures proposed in other policies within the DPD.

For example, these mitigation measures could include requiring developments to meet various standards e.g. BREEAM standards, promoting sustainable travel, and including measures to protect and enhance biodiversity. It is noted that the Code for Sustainable Homes has been withdrawn and replaced with optional water standards and powers for requiring energy

efficiency standards as stated within the March 2015 Ministerial Statement. Table 3-4 uses the notations outlined below.

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

Table 3-4 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	+	

3.2.5 SA Scoping Report Consultation

The SA process commenced in 2013 with the preparation of an SA Scoping Report for the Core Strategy Focused Review and the Site Allocations DPD (Hyder Report Reference: 5001-UA006314-UE31-01). The Scoping Report was in two parts – Part One covered the Core Strategy and Part Two, the Site Allocations DPD. The Scoping Report was issued to the Statutory Consultees, Natural England, Historic England and the Environment Agency in October 2013 for comment. It was also published on the Council's website.

Following the identified need for a whole plan review rather than a focussed review of the Core Strategy a Scoping Letter was issued to Statutory Consultees and other relevant organisations and published on the Council's website in September 2014. The Scoping Letter provided an update to the change in scope since the 2013 Scoping Report.

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

3.3 Stage B: Developing and Refining Options and Assessing Effects

3.3.1 Alternatives

As identified in Box 3, the SEA Directive requires that the assessment process considers alternatives:

Box 3: Consideration of Alternatives

"...an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" (2001/42/EC) (Article 5.1).

The Practical Guide advises that only realistic and relevant alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects.

Identification of Reasonable Alternatives

Amount of Housing

The alternative scenarios for housing requirement projections are set out in the Topic Paper: Reviewing the Ipswich Housing Figures (January 2014) and relate to identifying a robust and realistic forecast of the likely number of new dwellings required. Alternative scenarios were investigated to apply different assumptions in relation to population change. These scenarios were Trend Migration, Low Migration, Household Constrained and East of England Forecasting Model. The Topic Paper outlines why the Trend Migration scenario is the most suitable to apply in determining the objectively assessed housing need for Ipswich Borough.

It is not appropriate to assess these scenarios through the SA process as their purpose is to arrive at the most likely nature and scale of future population change within the Borough. Identifying the likely sustainability effects of the different scenarios would not assist in this process of identifying need and therefore these alternatives are not intended to not be viewed in the same manner as alternative strategies identified as part of the SA process. This is reflected in the Planning Practice Guidance which states '*The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not*

apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.⁵

It should also be noted that a 'no plan' option i.e. continuation of the adopted CS2 has not been assessed as it is not considered to be a reasonable alternative (housing need has been updated).

Strategic Spatial Alternatives

The Topic Paper: Reviewing the Ipswich Housing Figures (January 2014) identified two alternative strategies for meeting the objectively assessed housing need.

Alternative strategy 1 in the Housing Topic Paper considers the potential for securing higher density development on housing sites to deliver a higher number of homes. Whilst it was concluded that this is unlikely to be deliverable at present due to economic conditions, this option could represent a realistic alternative in the longer term should economic conditions change. It would be an alternative to the proposed wording of policies CS2 and CS7 which states that the council will work with neighbouring local authorities to address housing need later in the plan period.

For the purposes of undertaking the SA, the residual need (minus windfalls) that would need to be met in neighbouring local authority areas is around 4,000 dwellings.

Alternative strategy 2 in the Housing Topic Paper put forward a further alternative whereby a greater amount of housing would be delivered outside of the Borough whilst the development at the Garden Suburb would reduce from 3,500 to 1,500. The development of the Garden Suburb is intended to come forward during the earlier stages of the plan period in acknowledgement that the release of all phases is necessary to secure the required infrastructure. It is not possible to instead rely on delivery in neighbouring local authority areas during this time as their currently adopted Core Strategies do not incorporate provision for meeting Ipswich's shortfall – this is an issue that would need to be addressed through joint working between Ipswich Borough Council and the adjoining authorities. The conclusion that this alternative is not realistic therefore remains.

Consideration has also been given to the potential to release employment sites which have been allocated for some time but not been developed. However, of the two sites to which this applies one (IP147) is understood to be coming forward shortly for employment purposes and the other (made up of IP058, IP067 and IP099) is located adjacent to a sewage works and therefore not suitable for residential use. This option is therefore not considered to be realistic.

The development of sites identified in the SHLAA and the development of smaller sites (such as appropriate back gardens) is accounted for within the windfall figure at rates consistent with past delivery and the availability of deliverable sites (the latter of which has been assessed through the SHLAA). It is therefore not realistic to include an alternative which would see a greater amount of development from such sites.

In conclusion only alternative strategy 1 has been considered to be reasonable and is appraised in Section 4 and Appendix D as an alternative to the spatial strategy set out in CS2. The assessment of the alternative is appraised alongside proposed CS2 with commentary stating whether the alternative performs better or worse.

Policy Alternatives and Evolution

⁵ Reference ID: 2a-004-20140306

The Core Strategy and Development Management Policies have evolved since the 2011 Core Strategy and again since the 2013 Focussed Review⁶ and further whole plan review and modifications in 2014 and 2015. Where significant changes have occurred, the SA has been revised. This evolution is described where appropriate in Appendices D, E, F and I. It also considers the effects of not producing a policy in each case (NB for the Development Management Policies and some Core Strategy Policies this relates to the assessment undertaken in 2009).

3.3.2 Assessment of the Vision

Good practice guidance recommends that the key aims and principles of the plan should be assessed against the SA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.

The Vision for the Core Strategy has been reviewed against the SA Objectives, and a summary of the key strengths, weaknesses and recommendations have been identified (as presented in Section 4.1). Recommendations were made to offset or alleviate any adverse impacts that were predicted, or to enhance any opportunities that were identified.

3.3.3 Assessment of the Strategic Objectives

Good practice guidance also recommends that the goals of a plan should be assessed against the SA Objectives.

The assessment of the twelve Strategic Objectives of the Core Strategy against the SA Objectives has been undertaken using a matrix based approach to determine their compatibility. Recommendations were suggested to offset or alleviate any potential sustainability conflicts between the Strategic Objectives and the SA Objectives. The assessment is presented in Section 4.2.

3.3.4 Appraisal of the Core Strategy Policies

The 20 Core Strategy Policies provide the strategic spatial approach to the development of Ipswich with ensuring the essential components 'live, work and play' are provided for. Infrastructure policies are also included as they support growth and development. The strategic spatial approach outlines the type, quantity and distribution of new development to 2031.

The Core Strategy Policies have been assessed in relevant groups against the SA Objectives to enable the identification of key strengths and weaknesses, and any potential areas for improvement. Mitigation measures and recommendations are suggested where relevant to offset or alleviate any predicted adverse impacts, or to enhance any opportunities that have been identified.

The assessment of the Core Strategy Policies has been undertaken using a matrix based approach. The assessment notations used in the assessment, together with their definition (i.e. how a positive score was assigned) are presented in Tables 3-5 and 3-6. When undertaking the assessment, the symbols assigned in the matrix were justified in the commentary box along with any uncertainties. The Pre-Submission Main Modifications were also each considered in terms of whether they would affect the SA, and a table detailing this is contained in Appendix I. The assessments detailed in this section and presented in detail in Appendix D incorporate any

⁶ Assessments were only undertaken in the 2013 SA where there were judged to be significant differences between the adopted plan and the focused review draft policy.

changes made as a result of the assessment of the Pre-Submission Main Modifications as presented in the SA Report Addendum (October 2015) and therefore represent the SA of the plan as submitted. Consideration was also given as to whether any of the Pre-Submission Additional Modifications would result in changes to the SA (although these were not subject to consultation) and the results of this are also presented in Appendix I.

Table 3-5 Notations used in the SA

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

Table 3-6 Temporal scale, Permanency and Certainty used in the SA

Long Term	Effects likely to arise in 10-25 years of Core Strategy implementation
Medium Term	Effects likely to arise in 5-10 years of Core Strategy implementation
Short Term	Effects likely to arise in 0-5 years of Core Strategy implementation
Direct	Direct effects.
Indirect	Indirect effects.
Reversible	Effects are reversible
Irreversible	Effects are irreversible
High/Medium/Low	High, medium or low certainty of prediction
Cumulative	Potential to have cumulative effect with other proposals or plans on this objective

A summary of the assessment of the Core Strategy Policies is provided in Section 4.3. The complete results of the assessment are presented in Appendix D.

3.3.5 Appraisal of the Development Management Policies

The Core Strategy contains 34 Development Management Policies designed to support the Core Strategy Policies and manage development in the borough.

The Development Management Policies have been assessed in groups against the SA Objectives using the technique described above for the assessment of the Core Strategy Policies. A summary of the assessment of the Development Management Policies is provided

in Section 4.4. The complete results of the assessment are presented in Appendix E. The assessment incorporates the assessment of the Pre-Submission Main Modifications as presented in the SA Report Addendum (October 2015) and is therefore the SA of the plan as submitted.

3.3.6 Appraisal of Cumulative and Synergistic Effects

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 offers the following interpretation of 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.

All elements of the Core Strategy were taken into account within the cumulative assessment along with combined impacts as a result of other initiatives proposed within the borough. Cumulative and Secondary effects have been included in the SA where appropriate and Section 5 provides detail.

3.3.7 Appraisal of Transboundary Effects

The SEA Directive requires SAs to consider the transboundary effects of the plan on other EU member states. However, it is not considered likely that the Core Strategy could have significant effects upon other member states. Transboundary effects are mentioned within the SA where considered appropriate.

3.4 Stage C: Preparation of the SA Report

This SA Report presents the findings of the SA including the information collated in Stage A and during scoping, and documents the SA process. The results of the appraisal together with any mitigation measures proposed are recorded in the remaining chapters of this document. This report represents the up-to-date assessment of the Core Strategy as submitted.

3.4.1 Habitats Regulations Assessment

Comments from Natural England on the Proposed Submission SA report stated that further cross-reference is needed between the Habitats Regulations Assessment (HRA) and the Sustainability Appraisal. The Proposed Submission SA Report provides cross-references to the HRA of the Proposed Submission Core Strategy DPD which was undertaken in parallel, ‘*Habitats Regulations Assessment for Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review December 2014*’. This assessment identified that the DPD would not be sound if an Appropriate Assessment could not show that there was no adverse effect upon the integrity of nature conservation sites of European importance as recognised by their designation as Special Areas of Conservation, Special Protection Areas and/or Ramsar sites.

The screening concluded that the Proposed Submission Core Strategy and Policies DPD was likely to have a significant effect on European sites, particularly with respect to ‘The Amount of Housing Required’ (Policy CS7) and related policies (CS2, CS10) particularly in terms of the

potential for recreational disturbance to birds in the Stour and Orwell Estuaries Special Protection Area. An Appropriate Assessment was therefore undertaken and this concluded that policy CS7 and related policies would not have an adverse effect upon the integrity of European Sites, subject to mitigation measures being applied.

An addendum to the Habitats Regulations Assessment was produced to consider the effects of the Pre-Submission Main Modifications and Pre-Submission Additional Modifications. This concluded that the conclusions of the Proposed Submission HRA Report remain unchanged. Further reference to the conclusions of the HRA were added to the SA assessment matrices, particularly in relation to assessment of CS7 against SA objective ET8.

3.5 Stage D: Consultation on the Core Strategy and the SA Report

As outlined in Chapter 1, the SA Report has been subject to consultation at a number of stages in line with the evolution of the Core Strategy. At each stage, the Core Strategy has been amended and SA has been undertaken on any significant changes. The most recent changes (the Pre-Submission Main Modifications consulted upon in autumn 2015) and an account of how they affect the findings of the SA is presented in Appendix I.

This SA Report has now been issued for Submission alongside the Core Strategy.

3.6 Stage E: Monitoring the significant effects of implementing the DPD

The activities relevant to monitoring that are stipulated in the SEA Directive are outlined below.

“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)).*

Based on the assessment conducted on the options and identification of potential significant environmental effects, a draft monitoring framework has been prepared and is presented in Section 6 of this report.

4 APPRAISAL OF THE CORE STRATEGY AND ALTERNATIVES

4.1 The Vision

The vision is outlined in Section 2.

4.1.1 Sustainability Comments

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 that potentially could restrict growth. 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 and 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).

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*'

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.

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 including Futura Park. Providing employment opportunities along with housing provision would seek to promote sustainable economic growth.

4.1.2 Recommendations and Mitigation Potential

No recommendations or mitigation are proposed.

4.2 Strategic Objectives

The Core Strategy contains 12 Strategic Objectives to deliver the vision. The Strategic Objectives are presented on Section 2. Table 4-1 presents the compatibility of the Core Strategy Strategic Objectives against the SA Objectives.

Table 4-1 Compatibility of the SA Objectives and the Strategic Objectives

SA Objectives	Strategic Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12
ET1. To improve air quality	✓	0	✗	✓	✓	?	0	✓	✓	0	0	0

SA Objectives	Strategic Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12
ET2. To conserve soil resources and quality	✓	0	✓	0	✓	0	0	✓	0	0	0	0
ET3. To reduce waste	✓	0	✗	0	✓	0	0	0	0	0	0	0
ET4. To reduce the effects of traffic upon the environment	✓	0	✗	✓	0	?	0	0	✓	0	0	✓
ET5. To improve access to key services for all sectors of the population	✓	0	✓	✓	0	✓	0	0	✓	✓	0	0
ET6. To limit and adapt to climate change	✓	✓	✗	0	✓	0	0	0	0	0	0	0
ET7. To protect and enhance the quality of water features and resources and reduce the risk of flooding	✓	✓	0	0	✓	0	✓	0	0	0	0	0
ET8. To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs, SPAs and SACs	✓	0	✗	0	✓	0	0	✓	0	0	0	✓
ET9. To conserve and enhance the historic environment, heritage assets and their settings	✓	0	✓	0	✓	0	0	0	0	0	0	✓
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscape	✓	0	✓	0	✓	0	0	✓	0	0	0	✓
HW1. To improve the health of those most in need	✓	0	0	0	✓	✓	0	✓	✓	✓	0	0
HW2. To improve the quality of life where people live and encourage community participation	✓	0	0	0	✓	✓	0	✓	✓	✓	✓	0
ER1. To reduce poverty and social exclusion	0	0	✓	0	✓	✓	0	✓	✓	✓	✓	0
ER2. To offer everybody the opportunity for rewarding and satisfying employment	✓	✓	✓	0	✓	0	0	0	0	✓	0	✓
ER3. To help meet the housing requirements for the whole community	✓	✓	✓	0	0	✓	✓	0	0	0	0	✓
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	✓	✓	✓	0	✓	✓	✓	0	0	0	0	✓
ER5. To support vital and viable town, district and local centres	✓	0	✓	✓	✓	✓	✓	0	0	0	0	✓
ER6. To encourage efficient patterns of movement in support of economic growth	✓	✓	0	✓	0	?	0	0	✓	0	0	✓
ER7. To encourage and accommodate both indigenous and inward investment	0	0	0	0	✓	✓	✓	0	0	0	0	✓
CL1. To maintain and improve access to education and skills for both young people and adults	0	✓	0	0	✓	✓	0	0	✓	✓	0	✓
CD1. To minimise potential opportunities for crime and antisocial activity	0	0	0	0	0	0	0	✓	0	✓	✓	0

Key

✓ = Objectives are compatible

✗ = Objectives are potentially incompatible

0 = There is no link between objectives

? = The link between the objectives is uncertain

4.2.1 Sustainability Comments

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.

On the whole, the Strategic Objectives and the SA Objectives complement each other, with many positive correlations and only five potential incompatibilities recorded. The link between three Strategic Objectives and three SA Objectives was recorded as uncertain.

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.

The three uncertainties are associated with Strategic Objective 6, transport. These 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.

4.2.2 Recommendations and Mitigation Potential

No recommendations or mitigation are proposed.

4.3 Core Strategy Policies

The following sections present a summary of the SA of the strategic spatial approach outlined in the Core Strategy. The detailed assessment of the Core Strategy Policies is provided in Appendix D and details of how these have been incorporated within the Core Strategy are set out in a separate Annex produced by Ipswich Borough Council. The Core Strategy comprises 20 Core Strategy Policies which we have grouped to ease the assessment process. The groups comprise:

Spatial Strategy	Policy CS2: The Location and Nature of Development
Development of the Strategy	Policy CS1: Sustainable Development – Climate Change
	Policy CS3: IP-One Area Action Plan
	Policy CS4: Protecting our Assets
	Policy CS5: Improving Accessibility
	Policy CS6: The Ipswich Policy Area
Live	Policy CS7: The Amount of Housing Required
	Policy CS8: The Balance between Flats and Houses
	Policy CS9: Previously Developed Land Target
	Policy CS10: Ipswich Garden Suburb (formerly Ipswich Northern Fringe)
	Policy CS11: Gypsy and Traveller Accommodation

	Policy CS12: Affordable Housing
Work	Policy CS13: Planning for Jobs Growth
	Policy CS14: Retail Development and Main Town Centre Uses
Learn	Policy CS15: Education Provision
Play	Policy CS16: Green Infrastructure, Sport and Recreation
Infrastructure	Policy CS17: Delivering Infrastructure
	Policy CS18: Strategic Flood Defence
	Policy CS19: Provision of Health Services
	Policy CS20: Key Transport Proposals

Each policy was assessed against a 'do nothing' option in the 2009 Sustainability Appraisal, with the exception of policies DM33 and DM34 which were not included in the Core Strategy at that time. A 'do nothing' option is however considered in below in relation to these policies.

4.3.1 Spatial Strategy (CS2)

Sustainability Comments

The policy seeks to focus the majority of new residential development and community facilities into the town centre, the Waterfront, Ipswich Village, and Ipswich Garden Suburb and into or within walking distance of the town's district centres and to support community development. Later in the plan period the council will look to work with neighbouring authorities to deliver housing in the wider Ipswich housing market area.

This approach, on the whole, scored positively against the economic and social SA Objectives. This was because it promotes sustainable growth, development and regeneration across the borough to meet local needs but also places the highest densities in central areas (within IP-One and local centres) which are most accessible and most densely populated providing support for community development to promote wellbeing and social inclusion. It directs primary retail development towards the town centre and employment uses to existing, established employment areas, also providing a strategic employment site at Futura Park. There is a heavy focus on improving sustainable travel and access together with dispersing open space throughout the borough. These later points may have benefits to the health and wellbeing of the community. This approach also maximises the use of previously developed land within the central areas which are also the least sensitive in terms of their natural environments. However, the central areas contain a number of heritage assets including historic buildings. There is some uncertainty regarding the effects of development on the setting of these assets although the policy does specify that heritage assets and historic character should not be compromised. There are also large areas of Flood Zones 2 and 3 within the central areas (IP One) therefore new development has the potential to increase flood risk, although, it is appreciated that this issue is covered by specific flood policies elsewhere within the Core Strategy. It is recommended that these areas are not developed until the Ipswich Flood Defence Scheme is implemented.

Another key element of the spatial strategy is the delivery of a significant area of new residential and community uses within the Garden Suburb. This large greenfield site provides for a significant portion of Ipswich's housing needs and hence contributes strongly to this objective. It also seeks to ensure that local centres, amenities and the required infrastructure are also delivered. Nonetheless, this would result in the loss of one of the last remaining large greenfield areas within the borough and consequently this is reflected in the performance against a number of the environmental objectives including negative effects on the local landscape, soil, ground water quality/run-off and biodiversity. No designated areas would be affected by this and it should be possible to reduce the extent of adverse effects through mitigation and good

design, notably through the provisions of the Garden Suburb Supplementary Planning Document (SPD) Interim Guidance (September 2014).

Overall the policy has a number of positive and negative scores against the environmental objectives to reflect the different aspects of the strategy as a whole. However, the increase in development is likely to increase the amount of waste produced and energy consumed. Carbon emissions are expected to increase although it is noted that elsewhere in the strategy there is a heavy emphasis on sustainable travel and sustainable building standards. The policy does not intend to propose development in areas that are covered by ecological designations. However, the proposals for the central urban areas and IP-One development are near to the Ramsar and SPA designations (also SSSI). It is not anticipated that the proposals would have likely significant effects on these areas directly although it will be important to consider the indirect effects of recreational pressure and undertake Habitats Regulations Assessment in conjunction with Natural England. This assessment is uncertain at this stage, however, it is important to note that this plan should be read as a whole and other policies (such as CS4 and DM31) would provide protection to these sites. The Appropriate Assessment⁷ concluded no adverse effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.

The effects of the spatial strategy on air quality and traffic were appraised as overall negative with a medium to low certainty. This reflects the cumulative increase in development and likely trip generation particularly in central areas and the Garden Suburb site. However, it should be noted that the policy encourages the provision of sustainable travel options and encourages development within the central areas which are already well served by sustainable transport and close to existing and proposed employment and amenities. The SA concludes that traffic is likely to increase overall although whether this may have a significant effect on congestion, air quality and the AQMAs is not certain. An interim traffic modelling report produced for the Core Strategy in August 2015 identified 109 road junctions in the borough where capacities may be exceeded or be significantly congested by 2031. Of these, the following junctions are located within the AQMAs.

- A1214 / B1067
- Prince's Street / Commercial Road
- A1156 / High Street / Museum Street
- Bond Street / Star Lane
- B1057 / Grove Ln / Warwick Rd
- A1156 / Soane Street
- Fonnereau Road / Crown Street
- Neal Street / Crown Street
- A1156 / Anglesea Road
- Bridge Street / A137 Grafton Way

⁷ The Appropriate Assessment report relates to assessment under the Habitats Directive and is available as a separate report.

- Burrell Road / Stoke St
- College Street / Star Lane / Greyfiars Road

The assumptions used to generate this traffic modelling included the growth proposed by new development in the borough but also a significant amount of background growth which is expected to occur anyway. It should also be made clear that the model does not include any of the proposed traffic mitigation measures such as sustainable transport measures. Furthermore, the traffic model has provided only interim results which are due to be revised in the near future. Consequently, the conclusions of this SA remain that whilst the new development proposed in the Core Strategy is likely to result in greater levels of traffic and emissions, the exact level of this alone is uncertain as is the overall outcome taking into account the mitigation measures proposed. The SA recommends that all future applications continue to thoroughly assess the cumulative effects of traffic and emissions and propose robust mitigation in line with other policies within the Core Strategy and the Garden Suburb SPD.

An element of uncertainty was also recorded with regard to the development of around 4,000 new dwellings in neighbouring authorities in the long-term. At this stage it is not known where these dwelling may be constructed although it is assumed that they would be close to the Ipswich boundary. As such it is not possible to say with any certainty what the effects on the SA Objectives would be, especially the environmental objectives which require a greater knowledge of location.

Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policy:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.
- The policy may benefit from a specific reference to ensuring the public realm is of a high quality design along with new structures. However, it is noted that Design mitigation is provided in the Garden Suburb SPD, Policy DM5 and the Urban Character SPD.

Alternatives

As identified in Section 3.3.1, only one reasonable alternative to the spatial strategy has been identified. This considers the potential for securing higher density development on housing sites to deliver a higher number of homes. Assuming that in future years this would be economically viable, this would mean delivering an additional 4,000 homes on sites and through windfalls from 2020/21 onwards which are currently anticipated to deliver 5,175 homes. If the additional 4,000 were to be shared evenly amongst the sites this would lead to almost doubling the proposed densities. Whilst it was concluded that this is unlikely to be deliverable at present due to economic conditions, this option could represent a realistic alternative in the longer term should economic conditions change. It would be an alternative to the proposed wording of policies CS2 and CS7 which states that the council will work with neighbouring local authorities to address housing need later in the plan period.

A detailed appraisal of the Alternative Strategy is provided alongside the Spatial Strategy in Appendix D. This concludes that providing for a higher density of new homes on the housing sites would generally perform negatively against the SA Objectives in terms of the following:

The alternative strategy provides for a higher density of new homes within the housing sites which may lead to greater traffic congestion and increased vehicular emissions compared with

the preferred option as there would be a larger increase in population at each site therefore a higher concentration of vehicle use in each location.

In addition, providing higher density development may lead to greater adverse effects on biodiversity, heritage assets, soil resources and landscape / townscape character than proposed CS2 as there would be less scope to provide soft landscaping, urban greening, new green infrastructure, areas of open space or potential new Local Nature Reserves – all of which create opportunities to enhance the natural, built and historical landscape. It may also result in a less diverse housing mix with more flats and smaller homes which may mean that housing needs across the borough are not adequately met.

Finally higher density development within areas susceptible to flooding in Ipswich may exacerbate current issues as there would be a reduced scope to incorporate open space and SuDS measures into new development.

However, the alternative was judged to perform positively in relation to conserving soil resources, minimising emissions related to climate change and conserving biodiversity, landscapes and townscapes of neighbouring authority areas.

In all other respects the alternative would perform similarly to proposed CS2.

Having considered the assessments of the alternative and proposed CS2, it is concluded that on balance the proposed CS2 would provide greater sustainability benefits for the reasons outlined above and would also offer greater certainty in terms of deliverability should economic circumstances not create favourable conditions for higher density development in the future. Therefore the Alternative Strategy was not taken further in the development of the Core Strategy.

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

Sustainability Comments

On the whole the policies scored positively against the SA Objectives.

CS1, CS4 and CS5 provide strong central policy for the Core Strategy as a whole by requiring a comprehensive approach to tackling climate change (through reducing energy use, carbon emissions and flood risk); conserving and enhancing the borough's built, heritage, natural and geological assets; and, improving accessibility through the location of development, managing travel demand and encouraging sustainable transport measures. Policy CS4 seeks the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance as well as taking steps to reduce the number of heritage assets at risk. It also states that new development should contribute to local distinctiveness, built form and scale of heritage assets through the use of appropriate design and materials supporting landscape and townscape objectives.

The environmental SA Objectives scored particularly well against these policies. This was largely due to the focus of Policy CS4 on protecting and promoting the enhancement of assets; conserving and enhancing local biodiversity, canopy cover and geodiversity interests as well as protected and priority species and the contribution of CS1 and CS5 on helping to reduce carbon and air quality emissions.

CS3 promotes the development of an IP-One Area Action Plan which will allocate and define a range of regenerative measures in this area including Ipswich Village, the Waterfront, parking, an Education Quarter and built and natural environmental improvements. This policy reflects

some of the benefits relating to a town centre focus within the spatial strategy (CS2) including the economic and social advantages to regeneration in this accessible area. Flood risk is a potential problem with much of the area within Flood Zone 2 or 3. This will be mitigated by the Ipswich Flood Defence Scheme once complete although it is recommended that development is phased to avoid flood risk areas until this time, as set out in CS18 with timescales for development identified in SP2 of the Site Allocations DPD. As per Policy CS2 there were also overall negative scores recorded for Policy CS3 against the SA Objectives associated with air quality, climate change and reducing the effects of transport on the environment. This was because it is likely that overall vehicle trips in this area will increase although whether this is likely to have a significant effect on air quality and the AQMAs is uncertain at this stage (see comments in section above). It should also be noted that whilst overall negative effects were ascribed, Policy CS3 focusses a large proportion of housing development within the central urban area which could be seen as positive as the area contains the majority of amenities and jobs and is accessible by public transport.

Policy CS6 recognises the importance of joint working with neighbouring authorities to coordinate planning policies around the fringes of Ipswich which would occur sooner within the plan period. It is assumed that this will benefit the overall delivery of sustainable development in relation to a number of sustainability objectives.

Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policies:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.
- Policy CS4 could be strengthened though a direct reference in the policy wording to protecting and enhancing the boroughs soil resource and function.
- It is noted that there are overlaps between Policy CS4 and DM31. Nonetheless, there is considerable scope to expand Policy CS4 given its overarching nature at the front of the plan, in particular to protect and enhance the borough's designated natural assets including principally European, National and local level designations. A reiteration of the text in DM31 regarding protection of the European sites is recommended.
- Although it is not the purpose of Policy CS3 it should be ensured new development integrates well into the existing townscape, it is therefore recommended that a specific reference to this is included within CS3.

Alternatives

The consideration of 'do nothing' i.e. 'no policy' was undertaken in the 2009 SA against Policies CS1, CS3, CS4, CS5 and CS6. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and direction, lower environmental standards and fewer opportunities for enhancement and regeneration.

There have been minor changes to Policy CS1 since the 2013 focussed review. This reflects changes in relation to the Council's carbon reduction target and reference to support Travel Ipswich's 15% modal shift is now included. However, the carbon reduction target was only relevant to the Council's own operations and therefore unlikely to significantly affect new development. The inclusion of the reference to support Travel Ipswich's 15% modal shift would help to reduce carbon emissions further in the borough and may benefit air quality, the AQMAs and health though encouraging people to walk / cycle rather than using their cars. Minor changes to Policies CS3, CS4, CS5 and CS6 are not considered to have made a significant difference to the SA.

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

Sustainability Comments

These policies cover the amount and type of housing required including some locational direction in CS9 (Previously Developed Land) and CS10 (Ipswich Garden Suburb).

The amount of new housing required is set by the establishment of housing needs. This therefore performs strongly against the SA Objectives relating to housing need and other social and economic objectives. In essence the appraisal of policy CS7 also reflects the location of housing appraised in policy CS2. Similarly, policies CS8, CS11 and CS12 refer to the need to meet the needs of different groups and again perform strongly against SA Objective '*ER3. To help meet the housing requirements for the whole community*'. CS11 stops short of identifying land for gypsy and traveller accommodation but provides guidance on site selection including minimising any adverse effects.

Policy CS9 encourages development to be on previously developed land first. This is a sustainable approach which is also more likely to avoid areas of ecological and landscape value.

Policy CS10 reiterates the role and structure of the Garden Suburb proposal including the range of uses proposed within it and the requirement to follow the SPD which lays out clear principles for how the site should be developed including phasing and infrastructure provision as well as how development should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area. In essence the Garden Suburb has been appraised as part of CS2 and the scores relevant to the site are reflected here. In particular, the policy performs strongly in terms of meeting housing needs, access to services and a range of social benefits for the new residents. With the Council taking consideration of compulsory purchase powers where necessary, the Policy would also enable growth through development and infrastructure and would contribute towards improving access to key services and improving quality of life. The Garden Suburb is nonetheless a large greenfield development which is likely to affect the local landscape and a number of other environmental features, albeit it may be possible to reduce these through careful planning and mitigation. The Appropriate Assessment⁷ concluded no adverse effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.

As per the previous policy summaries, the 7,229 new homes to be developed in the borough would increase vehicle movements which may affect local air quality and potentially the four AQMAs although the significance of this is uncertain at this stage. In addition, the 4,051 to be delivered through working with neighbouring authorities may also affect air quality depending upon their location, although, without knowing where these could be located there is considerable uncertainty regarding this. However, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb Supplementary Planning Document Interim Guidance (September 2014). At this stage overall negative effect have been ascribed to Policies CS7 and CS10 overall with regard to air quality and the effects of traffic on the environment.

Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policies:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the

guidance in the Garden Suburb SPD, Policy CS5. Policy DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.

- That said opportunities should be sought (particularly within Policy CS10) to encourage recycling within the new housing developments. Facilities should be provided to encourage reuse/recycling.
- Policy CS11 could be strengthened though removing the reference to conservation areas and historic sites in clauses ii and iii respectively and adding a new clause that states 'heritage assets'.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against Policies CS7, CS8, CS9, CS10, CS11 and CS12. In the case of CS8, CS9, CS10, CS11 and CS12 the 'do nothing' scenario performed worse against the SA Objectives than with the policies in place as without the policies housing mix would become unbalanced, developer led and there would unlikely be enough affordable family homes delivered. For Policy CS7 the 'do nothing' scored better against some of the environmental SA Objectives as no target in place would result in a lower number of homes being built – although it should be noted that housing need would not be met.

As relatively significant changes were proposed to CS7 and CS10 as part of the Draft Core Strategy Focused Review which was consulted on in early 2014, the SA considered an alternative 'do nothing' option which would mean relying upon the policies in the adopted 2011 Core Strategy. An alternative of a lower level of housing at the Garden Suburb was considered as part of the alternatives under CS2 (refer to section 4.3.1) although was not considered to be reasonable.

There have been minor changes to Policies CS7 and CS9 since the 2013 focussed review. Changes included updated housing targets and the removal of the 60% target for developing on previously developed land. The updates were due to previous targets no longer being considered reasonable alternatives especially with regard to the limited amount of previously developed land available in the Borough and the fact that housing numbers are based on an objectively assessed need. Changes to the other policies in this section, such as the removal of allocations for gypsy and traveller pitch provision in the Site Allocations DPD and amendments to the affordable housing targets are not considered to have made a significant difference to the SA.

4.3.4 Work (CS13 and CS14)

Sustainability Comments

Policies CS13 and CS14 seek to provide significant employment (including retail) opportunities (i.e. 12,500 new jobs) within the Borough. Therefore, the policies score very strongly against the economic SA Objectives. Together they would provide the foundations to improve existing high levels of income and employment deprivation, improve the vitality and viability of the Ipswich Central Shopping Area, encourage new business formation and encourage inward investment. This could have indirect benefits to a number of social objectives including encourage healthy lifestyles through focussing employment development within the accessible town centre which may help promote walking and cycling to work. The Core Strategy has identified sufficient employment land to meet the Employment Land Needs Assessment (2015). CS14 seeks to promote retail and other town centre uses within the town centre. The principle of the growth of town centre uses in this area is reflected in the appraisal of the spatial strategy CS2.

The creation of new employment opportunities may also result in potentially negative environmental effects (e.g. increase in traffic, waste, energy, effects on biodiversity, townscape

character, flooding etc) depending on the design of the site and its location. Those sites which are within areas of flood zone may also increase the risk of flooding and should not be developed until the Ipswich Flood Defence Scheme is operational as set out in CS18 and in policy SP2 of the Site Allocations DPD. Many sites are in central locations but others are spread across wider areas of the Borough. Scores in this case are largely both positive and negative which reflects the potential for such negative effects but also the ability for new employment sites to regenerate previously developed sites and to improve the character of some areas through mitigation and enhancement measures. The principles of this are reflected in the appraisal of CS2 including regarding traffic and air quality.

Since the SA was undertaken on policy CS13 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.

Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policies:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5. Policy DM17 and the Travel Ipswich Scheme.
- With regards to flooding, it should be ensured that the allocated 30ha (minimum) of new employment development (Policy CS13) is outside flood zones 2 and 3, which may mean waiting until the proposed flood defences are completed.
- It should be ensured that the 30ha (minimum) of new employment development (Policy CS13) is located away from statutory designated sites and is well integrated into the existing environment.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 against Policies CS13 and CS14. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because without the policies employment may not be focused within accessible locations i.e. out of town retail may be developed and fewer jobs may be created as there would be no targets.

There have been minor changes to Policy CS13 since the 2013 focussed review. The policy now plans for 12,500 jobs rather than 18,000 and provides for 10ha of development at Futura Park rather than 16.7ha. This update was due to previous targets no longer being considered reasonable alternatives following a change in economic conditions.

Minor changes to Policy CS14 are not considered to have made a significant difference to the SA.

4.3.5 Learn (CS15)

Sustainability Comments

Policy CS15 seeks to ensure the provision of educational facilities in the Borough. Therefore largely positive scores were recorded against the social and economic policies, as providing educational facilities in accessible locations may encourage people to walk / cycle to school, would create construction jobs and elementary jobs, would help to support the vitality and viability of the centres and may even potentially attract businesses to locate near them.

Regarding the environmental SA Objectives, securing educational development on previously developed land such as the Suffolk New College and University Campus Suffolk would represent a positive use of land resources and may protect biodiversity resources. However, conversely educational development at the Garden Suburb would not represent a sustainable use of land resources as the site is greenfield and may adversely affect biodiversity resources. Effects on heritage assets were assessed as uncertain as it would depend upon where educational development was specifically located, this may also be true for landscape / townscape character, however, ensuring high quality design that complements and enhances the character and quality of the local townscape would mitigate against any adverse effects.

Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policy:

- It is recommended that the policy should include a link to the Travel Ipswich scheme.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 against Policy CS15. The 'do nothing' performed worse against the SA Objectives than with the policy in place. This was because there would be no guidance in place to support educational provision to meet local need.

There have been minor changes to Policy CS15 since the 2013 focussed review i.e. the removal of support for a new 14 – 19 centre outside the borough, however, this and other changes are not considered to have made a significant difference to the SA scores on the whole.

4.3.6 Play (CS16)

Sustainability Comments

Policy CS16 seeks to enhance and extend the ecological network, green corridors and open spaces across Ipswich. Therefore, positive scores were recorded against many of the environmental SA Objectives. This was because policy would help to protect and conserve biodiversity resources, maintain soil quality, reduce effects of traffic upon the environment by encouraging more sustainable movement across networks, protect designated sites and conserve and enhance the quality and local distinctiveness of landscapes and townscapes.

Positive scores were also recorded against the social SA Objectives as the policy may contribute to encouraging healthy lifestyles through the provision of safe and freely accessible open spaces, sport and recreational facilities. It would also help to protect residents from amenity pollution and noise and light pollution which would contribute towards improving the quality of life where people live.

The scores against the economic SA Objectives were largely neutral, however, providing green spaces in accessible locations may help to improve access to shops, services and facilities across the borough and may help to improve the image and reputation of local areas as places to live, work and visit.

Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against Policy CS16. The 'do nothing' option performed worse against the SA Objectives than with the policy in place. This was because there would be no guidance in place to support the provision of green infrastructure, sport and recreation facilities that benefit health and wellbeing along with providing many environmental benefits such as new habitats, flood storage and positive effects on townscape/ landscape character and quality.

There have been minor changes to Policy CS16 since the 2013 focussed review including support for the provision of an extension to the Orwell Country Park and potentially a visitor centre - subject to effects on the SPA. This would provide greater opportunities for recreation and healthy lifestyles and may enhance the image of Ipswich as a place people want to visit.

4.3.7 Infrastructure (CS17, CS18, CS19 and CS20)

Sustainability Comments

Policies CS17, CS18, CS19 and CS20 collectively seek to ensure infrastructure needs associated with new development are met. Therefore largely positive and neutral effects were recorded across the social, environmental and economic SA Objectives. Adequate infrastructure would help to relieve congestion at key routes of the Borough and the requirement for funding for off-site measures could help to address wider road capacity and congestion issues and thus result in improved air quality in the long term. The policies also seek to improve access to open space, school and health facilities and play areas in addition to providing new areas – this would also have health benefits and may enhance quality of life. CS20 seeks to support measures to facilitate walking and cycling within the borough which provide benefits to improving access, health and reducing traffic effects upon the environment. CS18 would create major benefits in terms of reducing the risk of flooding through the support to implement the Ipswich Flood Defence Management Strategy.

Policy CS17 would enable the conservation and enhancement of biodiversity, landscape and townscape with the provision of a Country Park, green infrastructure and public realm improvements. Further contributions to conserving and enhancing biodiversity particularly in respect of European protected sites would be made as the Council will seek contributions to ensure that mitigation measures identified in the HRA can be addressed, including for any measures not classified as infrastructure.

Policies CS17, CS18, and CS20 would also all encourage sustainable economic growth through their commitment to provide key infrastructure thus facilitating new business formation and meeting the needs of business through improved access. In addition, town centre enhancements and enhanced pedestrian environment at the Waterfront may attract more visitors which will support the local economy.

Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policy.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 against Policies CS17 (this was also re-assessed in 2013), CS18, CS19 and CS20. The 'do nothing' performed worse against the SA Objectives than with the policies in place. This was because there would be fewer opportunities for providing control and direction, lower environmental standards (i.e. less emphasis on avoiding development in flood zones) and fewer opportunities for the enhancement of infrastructure and facilities provision. However, it should be noted that even without these policies in place, other measures such as national planning policy guidance and the role of statutory regulators would still be enforced.

There have been minor changes to CS20 since the 2013 focussed review. Policy CS20 no longer includes reference to the 'Bacon Chord', however, this is because the project has now been completed. Minor changes to other policies are not considered to have made a significant difference to the SA.

4.4 Development Management Policies

The following sections present a summary of the SA of the development management policies outlined in the Core Strategy. The detailed assessment of the development management policies is provided in Appendix E. The Core Strategy comprises 29 Development Management Policies which we have grouped to ease the assessment process. The groups comprise:

Sustainable Development, Flooding and Sustainable Drainage	Policy DM1: Sustainable Design and Construction
	Policy DM2: Decentralised Renewable or Low Carbon Energy
	Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments
	Policy DM4: Development and Flood Risk
Urban Design Policies and Protecting Our Assets	Policy DM5: Design and Character
	Policy DM6: Tall Buildings
	Policy DM8: Heritage Assets and Conservation
	Policy DM9: Buildings of Townscape Interest
Small Scale Residential Development, Small Scale Infill and Backland Residential Development, Subdivision of Family Dwellings, Affordable Housing and the Density of Residential Development	Policy DM10: Protection of Trees and Hedgerows
	Policy DM12: Extensions to Dwellinghouses and the Provision of Ancillary Buildings
	Policy DM13: Small Scale Infill and Backland Residential Development
	Policy DM14: The Sub-division of Family Dwellings
	Policy DM24: Affordable Housing

Transport and Access	Policy DM30: The Density of Residential Development
	Policy DM17: Transport and Access in New Developments
	Policy DM18: Car and Cycle Parking
Proposals in Retail Areas	Policy DM20: The Central Shopping Area
	Policy DM21: District and Local Centres
	Policy DM22: Town Centre Uses Outside the Central Shopping Area
	Policy DM23: Retail Proposals Outside Defined Centres
Employment Land	Policy DM25: Protection of Employment Land
Amenity, Open Space, Sport and Recreation and Community Facilities	Policy DM26: Protection of Amenity
	Policy DM27: Non-residential Uses in Residential Areas
	Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities
	Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities
	Policy DM32: Protection and Provision of Community Facilities
	Policy DM31: The Natural Environment
The Natural Environment	Policy DM33: Green Corridors
	Policy DM34: Countryside

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

Sustainability Comments

The policies generally scored positively against the SA Objectives. This was largely due to the nature of the policies seeking to promote sustainable development. There were, however, uncertainties recorded against Policy DM2 '*Decentralised Renewable or Low Carbon Energy*' and the SA Objectives associated with biodiversity, heritage assets and landscape. This was because renewable and low carbon energy schemes have the potential to impact on the setting of heritage assets, change landscape character and adversely affect biodiversity (particularly birds and bats with regards to wind turbines). As the location of such development is unknown, effects were deemed uncertain. Policy DM4 scored well against the environmental SA Objectives ET6 '*To limit and adapt to climate change*' and ET7 '*To protect and enhance the quality of water features and resources and reduce the risk of flooding*' as it ensures new development does not exacerbate current flooding in the borough along with providing SuDs measures where appropriate. Policy DM4 also ensures water efficiency measures are maximised in new development.

The scores against the social and economic SA Objectives were largely neutral with some positives. This was due to the limited effects the policies could lead to. Positive scores were associated with ensuring new development is highly accessible to existing facilities, including health facilities and through committing to a minimum BREEAM standard which may help to encourage investment (the provision of sustainable offices). Also, ensuring development achieves reductions in CO₂ emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L), meets water efficiency standards of 110 litres/person/day and conversions achieve a minimum BREEAM Domestic Refurbishment 'Very Good', may

contribute to improving housing stock which could reduce high levels of living environment deprivation within the borough. Policy DM1 scored major positive against SA Objective ET6 '*To limit and adapt to climate change*' and the supporting text refers to the introduction of the Home Quality Mark which demonstrates factors including energy use and air quality. This supports the SA Objective through encouraging achievement of a high rating under the quality mark.

Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- It is recommended that Policy DM2 includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant adverse effects.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing direction to encourage sustainable development or encouraging private amenity space and lower environmental standards i.e. less guidance to ensure development does not occur in flood zones. However, note that other national policy measures and the role of the Environment Agency would still apply.

There have been minor changes to Policy DM1 since the 2013 focussed review. The policy now requires lower BREEAM standards, water efficiency standards and CO₂ emissions reductions. Although standards have been reduced in the updated policy, a high standard is still required, however, the standards required are now more viable, achievable and deliverable so may result in more developers meeting the requirements albeit at a cost of slightly lower standards. Minor changes to Policies DM2, DM3 and DM4 are not considered to have made a significant difference to the SA scores.

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

Sustainability Comments

The policies collectively seek to ensure high quality design whilst protecting the Borough's built and natural assets. Therefore, the policies scored well against the environmental SA Objectives. Policies DM5, DM6, DM8 and DM9 all benefit landscape / townscape / heritage through their commitment to conserving and enhancing sites of historical importance, retaining buildings of townscape interest, ensuring tall buildings do not have adverse effects on the setting of Conservation Areas, listed buildings and other heritage assets, protecting and enhancing the distinctiveness of Ipswich including the setting of any nearby listed buildings and promoting high quality design, all of which would help to protect the character of the urban areas. Additionally, Policy DM8 states that the Council will resist the demolition or partial demolition of both designated and undesignated heritage assets which further supports SA Objective ET9 '*To conserve and where appropriate enhance areas and sites of historical importance*'. Policy DM9 supports protection, retention and repair buildings judged to be of local townscape interest, particularly those with no other statutory protection. Policy DM10 commits to providing and protecting urban greening – this would benefit local townscape along with, providing biodiversity and air quality benefits.

Effects against the social and economic SA Objectives were largely neutral with some positive scores. Under DM5, positive scores were related to promoting mixed use developments and

neighbourhoods. This could lead to a reduced need to travel and improved access to key local services such as GPs, dentists etc. In addition, requiring new layouts and designs to be orientated towards cyclists and pedestrians could promote healthier and more sustainable forms of transport in Ipswich and help combat conditions such as obesity and its related health conditions. It should also be noted that improving the built environment in Ipswich over time may also encourage and accommodate both indigenous and inward investment. In addition Policy DM5 also scored positively against meeting housing requirements as it requires a proportion of affordable housing to be provided and built to Building Regulations standard M4(3) and it also takes account of the new optional Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings both of which will contribute towards helping to meet housing requirements for the whole of the community as well as improving quality of life and improving health.

Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- Policy DM10 may benefit further through including a reference to the Hedgerow Regulations 1997 which protect 'important hedgerows' from being removed (uprooted or destroyed).

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in 2009 against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control or opportunities for enhancement of the built environment in Ipswich.

There have been minor changes to Policy DM8 since the 2013 focussed review. The policy has now been expanded to protect not only Conservation Areas but other heritage assets in Ipswich. Therefore the policy provides greater protection of the historic environment and heritage assets. Minor changes to other policies are not considered to have made a significant difference to the SA.

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

Sustainability Comments

The policies seek to manage small infill development, extensions, the sub-division of family homes, the provision of affordable housing and the density of new development (i.e. high within the town centre and lower elsewhere). All of which scored well against the social SA Objectives as they seek to ensure there is the right mix of new homes to meet local needs. The policies were also deemed to have health benefits as they would ultimately improve housing stock.

It should be noted that the principle and general location of new homes within the Borough was assessed within Policies CS2 and CS7. Therefore the assessment of Policies DM12, DM13, DM14 and DM30 focussed on the details relating to the type and make up of new housing. For this reason effects on the environment were limited. Although, effects against the environmental SA Objectives on the whole were recorded as positive and negative against Policy DM30 'the density of residential development'. This was because locating higher density homes within the

town centre would mean more homes may be located in flood zones, may increase vehicle travel in an area with four AQMAs and may adversely affect the setting of heritage assets. However, there are a far fewer biodiverse spaces in town centre where high density development is proposed, the policies propose densities that are more appropriate to the existing townscape character, and propose higher densities of homes in more accessible locations.

Effects against the economic SA Objectives on the whole were recorded as neutral, although it is worth noting that higher density development within the town centre would ensure homes are close to amenities, jobs and transport hubs.

Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- For Policy DM13, the loss of green space should be resisted where it would result in a significant loss of vegetation, trees etc that support valuable habitats.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because without the policies there may become an imbalance in housing mix which does not meet local need. In addition, there may be less control over developing in gardens and extensions to existing homes which may lead to lower environmental standards.

There have been minor changes to Policies DM12, DM13, DM14, DM24 and DM30 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA.

4.4.4 Transport and Access (DM17 and DM18)

Sustainability Comments

Together the policies ensure that transport and access provision is incorporated into new development that promotes sustainable traffic patterns in Ipswich. Policy DM17 states that to promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall not result in a significant adverse impact on rights of way or the local road network in respect of traffic capacity, highway safety, air quality or the four AQMAs. Therefore a number of positive effects were recorded against the SA Objectives relating to air quality, climate change, access, promoting sustainable transport and health. In addition, improvements to transport and access including walking, cycling, public transport and the Public Rights of Way network may over the long term support vital and viable town, district and local centres through improved accessibility. This would also be supported through improved cycle parking provision across the Borough and limited parking within the town centre.

Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and

direction for sustainable transport. Over time there would be an increase in private car use and greater adverse effects on air quality and the AQMAs.

There have been minor changes to Policies DM17 and DM18 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA.

4.4.5 Proposals in Retail Areas (DM20, DM21, DM22 and DM23)

Sustainability Comments

The policies collectively seek to focus retail development within a defined area, to retain and provide local shops and community facilities within defined District and Local Centres, to provide leisure, recreation, culture and tourism uses within the IP-One Area but outside the Central Shopping Area and to manage retail development outside defined District and Local Centres. Therefore, on the whole the policies performed well against the SA Objectives that seek to improve access, support vital and viable town centres, promote sustainable levels of prosperity and economic growth and encourage inward investment - as the policies together seek to focus appropriate retail and commercial development within defined boundaries and deter inappropriate use.

Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and direction for retail development. Without the policies in place this could lead to more out of town retail units which are not accessible or meet local need.

There have been minor changes to Policies DM20, DM21, DM22 and DM23 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA.

4.4.6 Employment Land (DM25)

Sustainability Comments

The policy seeks to safeguard employment land within existing and allocated employment sites in Ipswich. Therefore, effects against the economic and social SA Objectives were largely assessed as positive as safeguarding employment areas in accessible locations may offer opportunities for new jobs over the medium to long term, may encourage new business formation, would support district and local centres and may and diversify employment opportunities. The Policy would also partially support SA Objective ER3 *To help meet the housing requirements for the whole community* as in conjunction with the introduction of the Governments Starter Homes policy, it seeks to permit starter homes against criteria including provision where the housing would be compatible with existing and planned surrounding uses. Effects on waste were assessed as positive and negative as the Policy, where compatible with adjacent land uses, would seek to provide waste facilities within employment land however over the long term the Policy may increase waste production.

Effects against the environmental SA Objectives exhibited more negative effects and uncertainties. Policy DM25, may lead to an increase in vehicle movements related to people accessing employment which may negatively impact air quality, the AQMAs, carbon emissions

and the effects of transport on the environment although there is some uncertainty over whether this is significant or not. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport. Effects on flood risk were assessed as negative as the policy may over the long term increase flood risk within the IP One Area.

The HRA Appropriate Assessment identified that impacts from employment land could include increased risk of airborne emissions, water discharge and increased noise and light resulting in causing air pollution, water pollution and disturbance to birds respectively however the assessment concluded that employment sites generally have lower impact on European sites than housing and do not generate recreational impacts at distance as a result of increased human population therefore it concluded that the policy would not adversely affect the integrity of Stour and Orwell Estuaries SPA.

Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- Effects on water quality / pollution could be mitigated using standard, accepted mechanisms such as the Environment Agency's Pollution Prevention Guidelines.

Alternatives

The consideration of 'do nothing' i.e. no policy, was undertaken in the 2009 SA. The 'do nothing' option performed worse against the SA Objectives than with a policy in place. This was because there would be no safeguarding of existing employment sites which may lead to ad hoc employment development across the borough and potentially insufficient employment land coming forward.

There have been minor changes to Policy DM25 since the 2013 focussed review. The policy now includes a list of existing employment areas within the borough which should be safeguarded throughout the plan period. Therefore the policy now provides a greater protection to existing employment sites though this specific reference.

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

Sustainability Comments

The policies seek to protect the amenity of Ipswich's residents, manage non-residential use in residential areas, protect and provide open space, sport, and recreational facilities and protect and provide community facilities to meet local need.

Effects against the environmental SA Objectives were on the whole positive as protecting and providing open space would protect soil resources, may provide new habitats for wildlife, may provide flood storage and provide urban greening which may benefit townscape character.

Effects against the social SA Objectives were also largely beneficial as the policies seek to protect and increase the provision of open space, recreational facilities and opportunities for sport which would contribute to promoting healthy lifestyles across the borough. In addition, Policies DM25 and DM26 specifically seek to guard against adverse effects on amenity resulting from new development. They seek to do this by refusing development that would cause a material nuisance (i.e. through noise, light pollution etc.) and where it would be detrimental to human health, therefore effects were recorded as positive.

The policies against the economic SA Objectives were on the whole neutral. However, the commitment to the protection and provision of community facilities to meet local need may contribute to ensuring district and local centres are viable.

Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and direction and fewer opportunities for the enhancement and provision of open and amenity space. In addition the provision of community facilities to meet local needs may not be realised.

There have been minor changes to Policies DM26, DM27, DM28, DM29 and DM32 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA scores.

4.4.8 The Natural Environment (DM31, DM33 and DM34)

Sustainability Comments

The policies seek to guard the natural environment (including European sites and the countryside) against inappropriate development and provide and enhance green corridors.

Due to the nature of the policies many positive scores were recorded against the environmental SA Objectives. Policy DM31 specifically commits to protecting and enhancing biodiversity across the borough, including European sites and SSSIs. The Policy particularly makes a requirements for development to conserve the nature conservation and geodiversity interest of County Wildlife Sites, Regionally Important Geological Sites and County Geological Sites. In addition where possible, enhancements for protected sites and protected priority species would be expected. It also makes specific provision for the protection of European sites that mirrors the Habitats Directive, seeking developer contributions in some instances for mitigation measures. In addition, to establishing an ecological network across the borough all of which would benefit local wildlife along with helping to facilitate its movement throughout the borough.

Policy DM34 scored positively against SA Objective ET9 *To conserve and enhance the historic environment, heritage assets and their settings*, as in the case of new housing, it seeks to permit development that is required to secure the future of a heritage asset. The Policy would also benefit soil resources through its commitment to retaining the best and most versatile agricultural land, as well as through seeking to permit countryside housing development that re-uses disused buildings. Positive effects were also recorded against the SA Objectives that protect and enhance the quality of water features and conserve and enhance local landscapes and townscapes, with specific reference within the Policy made to conserving the landscape and scenic beauty of the AONB.

There may be health benefits associated with the policies as the establishment of attractive green corridors and ecological networks that connect the borough along with improving links to open spaces / the countryside may encourage people walk / cycle which in turn may encourage healthy lifestyle choices and benefit mental wellbeing.

The HRA Appropriate Assessment identified that one green corridor is adjacent to The Stour and Orwell Estuaries SPA. However it concluded that the Policy DM33 is unlikely to alter the

public access, amenity, recreational and green transport functions of this area bearing in mind its current use and would not adversely affect the integrity of Stour and Orwell Estuaries SPA.

Effects against the economic Objectives on the whole were neutral. However, the development of multi-functional green infrastructure in urban areas may contribute to making urban Ipswich an attractive place people may want to invest in.

Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- Policy DM31 could be strengthened through making reference to 'alone or in-combination with other proposals'.

Alternatives

The 'do nothing' option, i.e. no policy instead of DM31, DM33 and DM34 would perform worse against the SA Objectives than with the policies in place. This is because there would be less protection afforded to protecting the natural environment, providing and protecting green corridors and guarding the countryside from inappropriate assessment.

There have been significant changes to Policy DM31 since the 2013 focussed review. The policy now affords protection to the whole natural environment rather than local natural and geological interest. This would therefore help to improve the performance of the policy against the environmental SA Objectives and clarifies the protection afforded to European site. Policies DM33 and DM34 were not previously included within 2013 focussed review, therefore a comparison cannot be made.

5 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. 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.

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)
- Sroughton 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 – 200 homes (Suffolk Coastal – planning permission)

Table 5-1 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 below are considered to be significant effects.

Table 5-1 Cumulative and Synergistic Impacts

Receptor	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 low. The policies are likely to generate positive impacts upon educational attainment through: New and diverse employment provision which would provide skills and training opportunities; through allocating sites for education uses; through local partnerships and initiatives; and also through the provision of new educational facilities at the Garden Suburb.
Crime and fear of crime (CD1 To minimise potential opportunities for crime and anti-social activity)	Neutral / Positive	Crime levels are generally higher across the Borough when compared to national average figures. The projected housing and population growth may result in an influx of new residents and thus have a negative effect on crime level figures in the short-term. However, effects are assessed as neutral/positive in the long-term as cumulatively it is considered that the policies in the Core Strategy would contribute to the achievement of social and economic objectives which may indirectly result in reduced crime levels. The level of certainty of prediction is low.

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
Access to goods and services (ET5 To improve access to key services for all sectors of the population)	Positive	There is a clear focus on ensuring adequate local service provision is provided as part of new development along with making sure that new development is accessible by public transport, walking and cycling links.
Health and wellbeing (HW1 To improve the health of those most in need HW2 To improve the quality of life where people live and encourage community participation)	Positive	Life expectancy from birth for males is slightly lower than the national average and life expectancy from birth for females is slightly higher than national averages. Whilst health and well-being is affected by a number of factors, there is the potential for policies and their application to contribute to improved well-being. This could be achieved through ensuring new housing and employment development is well designed and accessible along with developing a green infrastructure network and ensuring that areas of green space are available for formal and informal recreation. There would also be an ongoing benefit on health and well-being that would increase cumulatively over time.
Housing (ER3 To help meet the housing requirements for the whole community)	Positive	Cumulatively, the policies in the Core Strategy that address housing ensure that new housing development occurs in the most appropriate locations and meets the needs of a wide range of people. These policies, combined with those addressing infrastructure provision and accessibility all cumulatively ensure housing is supported by the appropriate range of facilities and is accessible to local services creating a high quality housing offer. 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.
Sustainable economic growth (ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area)	Positive	Cumulatively, the proposals in the Core Strategy would have a positive effect on sustainable growth throughout the Borough as employment opportunities would increase both in the short-term and the long-term through increasing the housing provision and the provision of employment land. This in combination with infrastructure improvements would create an attractive environment which may attract inward investment and encourage business growth. The Sproughton Strategic Employment site allocation (in the Babergh Core Strategy) will cumulatively support economic growth.
Biodiversity (ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs)	Positive / Negative	The policies in the Core Strategy on the whole would have both negative and positive effects on biodiversity and designated sites within the Borough. Cumulatively, land take for new development may have a negative effect associated with fragmentation and potential loss of habitats and species. However, the Core Strategy would present opportunities to enhance wildlife corridors, which cumulatively would benefit biodiversity. Positive effects may also occur as a result of the delivery of green infrastructure, enhancement of habitats within new developments (through the country park at the Garden Suburb and opportunities to enhance and provide new open space) and the remediation of contaminated land.
Landscape / townscape (ET10 To	Positive / Negative	Cumulatively, it is considered that urban expansion and projected growth would have both positive and negative effects on landscape due to

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
conserve and enhance the quality and local distinctiveness of landscapes and townscapes)		significant changes in landscape character as a general result of new development and the direct loss of agricultural land at the Garden Suburb. However, policies in the Core Strategy cumulatively ensure that local distinctiveness is protected, in addition to ensuring that rural character is protected. Some town centre regeneration projects may also improve existing derelict or run-down sites.
Climate change Air quality Energy efficiency Natural resources Sustainable travel / transport (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)	Positive / Negative	<p>The policies in the Core Strategy has 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. Conversely, growth as proposed by the Core Strategy is likely to nevertheless increase the number of cars in the Borough which would have adverse effects on sustainable travel, air quality and climate change (i.e. emissions from transport). In addition, housing development on the edge of but outside of Ipswich Borough may also contribute to increased movements into Ipswich and associated effects upon sustainable travel. There is a degree of uncertainty about these cumulative effects being realised as this is reliant upon travel choices of individual residents and workers (however, they do seek to encourage the use of sustainable modes of transport as far as practical).</p> <p>The delivery of Ipswich Flood Defence infrastructure will also provide benefits associated with increased resilience to climate change effects. All new development across the borough has the potential to result in a cumulative increase in the use of natural resources and waste generation.</p>
Water resources (ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding)	Negative / Positive	New development is likely to place pressure on water resources and increase consumption of water resources. However, there is mitigation suggested within the policies to ensure sustainable design, appropriate flood risk management and sustainable (urban) drainage systems are incorporated into new development. The enhancement of the green infrastructure and ecological network across the borough will also provide benefits for infiltration and water management. Mitigation is also provided in the Core Strategy encourage measures to reduce potable demand, use of rain water harvesting and greywater recycling systems to reduce domestic water use through encouraging sustainable design.

All mitigation measures identified in relation to the assessments of the policies at Proposed Submission stage were taken on board in the plan where appropriate. A separate report, Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations (Ipswich Borough Council, December 2014) was published alongside the Proposed Submission Core Strategy and its SA Report and explains how the recommended mitigation measures have been incorporated in the plan. No further mitigation measures were identified through the SA of the Pre-Submission Main Modifications.

6 MONITORING FRAMEWORK

This section provides an outline monitoring framework and advice for monitoring the significant effects (significant effects are outlined in Table 6-1) of implementing the Core Strategy. Monitoring is an ongoing process integral to the Core Strategy 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.

6.1 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)).

6.2 Approach

The monitoring framework has been developed to measure the performance of the Core Strategy against changes in defined indicators that are linked to its implementation. 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 Core Strategy, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in the Borough.

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.

6.3 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 6-1 has also been 'tied in' with the proposed monitoring framework for the Core Strategy.

6.4 Proposed Monitoring Framework

Table 6-1 provides a framework for monitoring the effects of the Core Strategy 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 Core Strategy.

Monitoring should be ongoing during the whole life of the Core Strategy. 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 Core Strategy 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 Core Strategy 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 6-1 focuses upon indicators which are relevant to the monitoring of the likely significant effects within Ipswich as a result of the Core Strategy.

Table 6-1 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 Core Strategy 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 Suffolk's estimated carbon footprint by 60% from the 2004 base level by 2025 (DECC data, SCC climate change partnership, 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	Development in the Garden Suburb will require greenfield land take which would affect the soil resource and functionality. The Core Strategy will seek to develop on brownfield land as a priority which represents a sustainable use of soil resources.	<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> <p>Percentage of development on previously developed land: Target not appropriate.</p>	Every three years
ET3. To reduce waste	The Core Strategy will seek to provide waste disposal and recycling facilities where possible with new development and encourage the reduction of waste. The Core Strategy 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 of growth.	<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
ET5. To improve access to key services for all sectors of the population	The Core Strategy 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 residential 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. The Core Strategy seeks to ensure new development incorporates water conservation, efficiency measures and SuDS where appropriate. 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): Number of new homes meeting standard of 110 litres/person/day (Ipswich Borough Council).</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 Core Strategy 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.</p> <p>Net change in extent of protected habitat: No net loss of area of protected habitat. 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	Development built to a high quality design along with heritage protection measures outlined in the Core Strategy would help to protect and enhance local townscape. Uncertain effects on some heritage assets including archaeology.	<p>Number of heritage assets 'at risk': To reduce number of heritage assets 'at risk' (Ipswich Borough Council).</p> <p>Landscape and townscape character: to demonstrate no deterioration in quality of landscape/townscape. Production of Urban Character SPD (Ipswich Borough Council).</p>	Every five years

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
landscapes and townscapes	Loss of open land at Garden Suburb.		
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 Core Strategy 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 approximately 12,500 jobs in the Borough 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 Core Strategy would lead to residential development across the borough which would help widen the choice, quality and affordability of housing. The provision of 5,596	Affordable housing provision In Ipswich and at the Garden Suburb: Ipswich Garden Suburb to provide for at least 35% on-site affordable housing and 15% elsewhere in the Borough (Ipswich Borough Council). Living environment deprivation: To improve Ipswich's rank for living environment deprivation (IMD).	Every three years

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
	new homes to 2031 would help to meet local needs.	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). Accessible and adaptable dwellings: Number and percentage of dwellings completed meeting Part M4(2) standards.	
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 Core Strategy 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 would support the viability of these areas.	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: To reduce number of vacant units in defined centres.	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 Core Strategy 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. (Census / Suffolk County Council Travel to Work surveys) No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site: Target to be established. Employment land take up: To develop 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 Core Strategy 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): 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).	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 established.	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.		

Appendix A

Review of Plans, Programmes and Environmental Protection Objectives

International Plans and Programmes

- World Summit on Sustainable Development (WSSD), Johannesburg, September 2002
- European Sustainable Development Strategy (2006)
- EU Sixth Environmental Action Plan 2002 - 2012
- European Spatial Development Perspective (ESDP) (May 1999)
- Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) (1998)
- UN Framework Convention on Climate Change (1992)
- Kyoto Protocol to the UN Framework Convention on Climate Change (1997)
- Second European Climate Change Programme (ECCP II) 2005
- Directive to Promote Electricity from Renewable Energy (2001/77/EC) (as amended by 2001/77/EC, 2003/30/EC and 2009/28/EC)
- European Transport Policy for 2010: A Time to Decide
- EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)
- Water Framework Directive (2000/60/EC)
- Drinking Water Directive (98/83/EC)
- Directive on the Assessment and Management of Flood Risks (2007/60/EC)
- UN Convention on Biological Diversity (1992)
- Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
- Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
- EU Birds Directive (2009/147/EC)
- Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)
- Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)
- EU Biodiversity Strategy (1998)
- European Landscape Convention (2000)
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972)
- Waste Framework Directive (2008/98/EC)
- Packaging and Packaging Waste Directive (94/62/EC) (as amended by 2004/12/EC and 2005/20/EC)
- Urban Waste Water Treatment Directive 91/271/EEC (as amended by 98/15/EC)
- SEA Directive 2001/42/EC
- IPCC Climate Change 2014 Synthesis Report (November 2014)

National Plans and Programmes

- UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)
- Sustainable Communities: Building for the Future (2003)

- Planning Act 2008
- Environmental Quality in Spatial Planning (2005)
- World Class Places: The Government's Strategy for Improving Quality of Place (2009)
- The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development (2005)
- Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)
- Climate Change Act (2008)
- Stern Review of the Economics of Climate Change (2006)
- UK Carbon Plan (2011)
- Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)
- Planning for Climate Change – Guidance and Model Policies for Local Authorities (2010)
- Energy White Paper: Meeting the Energy Challenge (2007)
- Energy Act 2013
- Planning and Energy Act 2008
- Delivering a Sustainable Transport System (2008)
- The Future of Transport White Paper – A Network for 2030 (2004)
- Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport (2009)
- Wildlife and Countryside Act (1981) (as amended 1991)
- The Conservation of Habitats and Species Regulations (2010) (as amended 2012)
- The Countryside and Rights of Way (CROW) Act (2000)
- The Natural Environment and Rural Communities Act (2006)
- Natural Environment White Paper (HM Government, 2011)
- The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
- Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association) (2004)
- UK Post-2010 Biodiversity Framework 2012
- Biodiversity Indicators in Your Pocket (2013) Defra
- A Strategy for England's Trees, Woodlands and Forests (2007)
- Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority, 2009)
- Heritage in Local Plans: How to create a sound plan under the NPPF (2012)
- The Geological Conservation Review (GCR) (ongoing)
- Safeguarding our Soils: A Strategy for England (Defra, 2009)
- Natural England's Green Infrastructure Guidance (2009)
- Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)

- Heritage White Paper: Heritage Protection for the 21st Century (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Water Resources Strategy for England and Wales (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Flood and Water Management Act (2010)
- Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management (2005)
- Waste Management Plan for England (2013)
- The Egan Review – Skills for Sustainable Communities (2004)
- Working for a Healthier Tomorrow – Dame Carol Black's Review of the health of Britain's working age population (2008)
- Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002
- Tackling Health Inequalities – A Programme for Action (2003, including the 2007 Status Report on the Programme for Action)
- Water for People and the Environment: A Strategy for England and Wales (2009)
- National Planning Policy Framework (2012)
- Planning Update Ministerial Statement (March 2015)
- Planning Policy for Travellers Sites (DCLG, 2015)
- Starter Homes Written Statement (March 2015)
- Fixing the Foundations: Creating a More Prosperous Nation (July 2015)
- Localism Act 2011
- National Planning Policy for Waste (2014)
- Building for Life 12 (2012)
- Europe 2020: UK National Reform Programme 2013 (April 2013)
- Local Air Quality Management: Consultation on options to improve air quality management in England (July 2013)

Regional and County Level Plans and Programmes

- A Sustainable Development Framework For The East Of England (2001)
- East of England Forecasting Model 2014
- Transforming Suffolk Community Strategy: Suffolk Strategic Partnership (2008)
- Suffolk Growth Strategy 2013
- Minerals and Waste Development Framework: Waste Core Strategy (Suffolk County Council, 2011)
- Minerals Core Strategy (Suffolk County Council, 2008)
- Joint Municipal Waste Management Strategy for Suffolk 2003 – 2020 (2003)
- Suffolk's Climate Action Plan 2 (2012)
- Suffolk's Local Transport Plan 2011 – 2031 (Part 1 and Part 2)
- New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013
- New Anglia Strategic Economic Plan (New Anglia Local Enterprise Partnership)

- East of England (LSC) Equality and Diversity Action Plan 2008
- Suffolk Haven Gateway Employment Land Review 2009
- East of England Plan for Sport (2004)
- Biodiversity Action Plan for Suffolk (Various dates)
- Anglian River Basin District (2009)
- In Step with Suffolk: Right of Way Improvement Plan (2006-16)
- Leading the Way – Green Economy Pathfinder Manifesto 2012-15, New Anglia LEP
- Wild Anglia Manifesto ,September 2013, Part 1 Aims and Objectives
- Suffolk's Nature Strategy (Wild Anglia, 2014)
- Suffolk Growth Strategy March 2013
- Joint Health and Wellbeing Strategy for Suffolk (Suffolk Health and Wellbeing Board, 2013)
- Suffolk Cycling Strategy (Suffolk County Council, 2014)
- Suffolk Walking Strategy (Suffolk County Council, 2015)
- Anglian Water's Water Resources Management Plan 2015

Local Plans and Programmes

- Ipswich Borough Council Level 2 Strategic Flood Risk Assessment (Ipswich Borough Council, 2011)
- The Ipswich Drainage and flood defence policy (2002 with minor updates in 2009)
- Integrated Landscape Character Objectives (2010)
- Countryside Character Volume 6: East of England (1998)
- Ipswich Economic Development Strategy 2013 – 2026 (Ipswich Borough Council)
- Building a Better Ipswich (Ipswich Borough Council Corporate Plan, 2012)
- Ipswich Cultural Strategy 2011-2014 (Ipswich Borough Council)
- Ipswich Environment Strategy (Ipswich Borough Council, 2010)
- The Ipswich Health and Wellbeing Strategy (Ipswich Borough Council, 2011 – 2016)
- Ipswich Housing Strategy 2010/11-15/16 (Ipswich Borough Council)
- Ipswich Town Centre Master Plan (Ipswich Borough Council, 2012)
- Tree Management Policy (Ipswich Borough Council, 2010)
- Allotment Strategy 2014-2020 (Ipswich Borough Council, 2005)
- Ipswich Housing Market Area Strategic Housing Market Assessment 2012
- Suffolk Coastal District Council Core Strategy and Development Management Policies adopted 5th (Suffolk Coastal District Council, July 2013)
- Mid Suffolk District Council Core Strategy Focused Review December 2012
 - Babergh Core Strategy and Policies 2011-2031 (Babergh District Council, 2014)
 - A Fairer Ipswich Equality Scheme 2012-15 (Ipswich Borough Council)
 - Community Cohesion Policy (Ipswich Borough Council, 2009)
 - Equality and Diversity Policy (Ipswich Borough Council, 2010)
 - Homelessness Strategy 2008-13 (Ipswich Borough Council)

- Air Quality Action Plan (Ipswich Borough Council, 2008)
- Tourism Strategy (Ipswich Borough Council, 2004)
- Ipswich Development and Flood Risk SPD (Ipswich Borough Council, 2014)
- Haven Gateway Green Infrastructure Study (Haven Gateway Partnership, 2008)
- Open Space and Biodiversity Policy/Strategy 2013-2023 (Ipswich Borough Council, 2013)
- Turning our Town Around - Advancing our Vision to create East Anglia's Waterfront Town (Ipswich Central, 2015)

Summary of International Plans and Programmes

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
World Summit on Sustainable Development (WSSD), Johannesburg, September 2002			
<p>The World Summit reaffirmed the international commitment to sustainable development. The aims are to:</p> <ul style="list-style-type: none"> Accelerate the shift towards sustainable consumption and production with a 10-year framework of programmes of action Reverse trend in loss of natural resources Urgently and substantially increase the global share of renewable energy Significantly reduce the rate of loss of biodiversity by 2010 	<p>No specific targets or indicators, however key actions include:</p> <ul style="list-style-type: none"> Greater resource efficiency Support business innovation and take up of best practice in technology and management Waste reduction and producer responsibility Sustainable consumer consumption and procurement Create a level playing field for renewable energy and energy efficiency New technology development Push on energy efficiency Low-carbon programmes Reduced impacts on biodiversity 	<p>The plan needs to include objectives that encourage resource efficiency. The plan should recognise the importance of renewable energy and the need to reduce energy consumption and improve energy efficiency. The plan needs to include policies that encourage and contribute to the protection and enhancement of biodiversity.</p>	<p>The SA Framework should include objectives relating to renewable energy use, biodiversity protection and enhancement, and careful use of natural resources. The SA Framework should include objectives to cover the action areas. The SA Framework should include objectives, indicators and targets that address biodiversity.</p>

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
European Sustainable Development Strategy (2006)			
<p>The Strategy sets out how the EU will effectively live up to its long-standing commitment to meet the challenges of sustainable development. It reaffirms the need for global solidarity and the importance of strengthening work with partners outside of the EU.</p> <p>The Strategy sets objectives and actions for seven key priority challenges until 2010. The priorities are:</p> <ul style="list-style-type: none"> Climate change and clean energy Sustainable transport Sustainable consumption and production Conservation and management of natural resources Public Health Social inclusion, demography and migration <p>Global poverty and sustainable development challenges</p>	<p>There are no specific indicators or targets of relevance.</p>	<p>The plan needs to take on board the key objectives, actions and priorities of the Strategy and contribute to the development of more sustainable communities by creating places where people want to live and work.</p>	<p>The SA Framework should include objectives that complement those of this Strategy.</p> <p>A cross section of objectives are required that cover a number of themes.</p>
EU Sixth Environmental Action Plan 2002 - 2012			
<p>The EAP reviews the significant environmental challenges and provides a framework for European environmental policy up to 2012.</p> <p>The Programme aims at:</p> <ul style="list-style-type: none"> Emphasising climate change as an outstanding challenge of the next 10 years and beyond and contributing to the long term objective of stabilising greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Thus a long term objective of a maximum global temperature increase of 2°C over pre-industrial levels and a CO₂ concentration below 550 ppm shall guide the Programme. In the longer term this is likely to require a global reduction in emissions of greenhouse gases by 70 % as compared to 1990 as identified by the Intergovernmental Panel on Climate Change (IPCC) Protecting, conserving, restoring and developing the functioning of natural systems, natural habitats, wild flora and fauna with the aim of halting desertification and the loss of biodiversity, including diversity of genetic resources, both in the EU and on a global scale 	<p>The Plan sets objectives and priority areas for action on tackling climate change. The aims set out in the document are to be pursued by the following objectives (some of these are now out of date and are therefore not included):</p> <ul style="list-style-type: none"> Fulfilment of the Kyoto Protocol commitment of an 8 % reduction in emissions by 2008-12 compared to 1990 levels for the EU as a whole, in accordance with the commitment of each Member State set out in the Council Conclusions of 16 and 17 June 1998 <p>Placing the Community in a credible position to advocate an international agreement on more stringent reduction targets for the second commitment period provided for by the Kyoto Protocol. This agreement should aim at cutting emissions significantly, taking full account, inter alia, of the findings of the IPCC 3rd Assessment Report, and</p>	<p>The plan needs to include policies that encompass the broad goals of the EU Plan e.g. recognising that local action needs to be taken with regard to climate change issues, protecting and enhancing biodiversity and encouraging waste reduction and recycling.</p>	<p>The SA should be mindful that documents prepared will need to conform to EU goals and aims, and should therefore include appropriate objectives, indicators and targets in the SA Framework.</p>

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<ul style="list-style-type: none"> Contributing to a high level of quality of life and social well being for citizens by providing an environment where the level of pollution does not give rise to harmful effects on human health and the environment and by encouraging a sustainable urban development <p>Better resource efficiency and resource and waste management to bring about more sustainable production and consumption patterns, thereby decoupling the use of resources and the generation of waste from the rate of economic growth and aiming to ensure that the consumption of renewable and non-renewable resources does not exceed the carrying capacity of the environment</p>	take into account the necessity to move towards a global equitable distribution of greenhouse gas emissions		
European Spatial Development Perspective (ESDP) (January 1999)			
<p>The European Spatial Development Perspective is based on the EU aim of achieving balanced and sustainable development, in particular by strengthening environmentally sound economic development and social cohesion. This means, in particular, reconciling the social and economic claims for spatial development with an area's ecological and cultural functions and, hence, contributing to a sustainable, and at larger scale, balanced territorial development.</p> <p>This is reflected in the three following fundamental goals of European policy:</p> <ul style="list-style-type: none"> Economic and social cohesion Conservation of natural resources and cultural heritage <p>More balanced competitiveness of the European territory</p>	There are no specific targets or indicators of relevance. Targets and measures for the most part deferred to Member States.	The plan needs to recognise the tensions between social, economic and environmental issues, and include policies that encourage sustainable development.	<p>The SA should include objectives that complement the principles of the ESDP.</p> <p>Care should be taken when preparing the SA to make sure it encompasses the philosophy of both national and international strategy documents.</p>
Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) (1998)			
<p>In order to contribute to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well-being, each Party subject to the convention shall guarantee the rights of access to information, public participation in decision-making, and access to justice in environmental matters in accordance with the provisions of this Convention.</p>	<p>As this is a high level EU policy document, responsibility for implementation has been deferred to the Member States:</p> <p>Each Party shall take the necessary legislative, regulatory and other measures, including measures to achieve compatibility between the provisions implementing the information, public participation and access-to-justice provisions in this Convention, as well as proper enforcement measures, to establish and maintain a clear, transparent and consistent framework to implement the provisions of this Convention.</p>	The development of the Local Plan should be a transparent process.	The SA should ensure that enough time is provided for consultation on the SA documents.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
UN Framework Convention on Climate Change (1992)			
<p>The convention sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change. It acknowledges that the climatic system is affected by many factors and is a shared system. Under the Convention governments have to:</p> <ul style="list-style-type: none"> ▪ Gather and share information on greenhouse gas emissions ▪ Launch national strategies for climate change <p>Co-operate in adapting to the impacts of climate change.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan should recognise local action needs to be taken with regards to climate change issues.</p>	<p>The SA Framework should include objectives, indicators and targets that relate to climate change, flooding and the need to reduce greenhouse gas emissions.</p>
Kyoto Protocol to the UN Framework Convention on Climate Change (1997)			
<p>The Kyoto protocol, adopted in 1997, reinforced the UN Framework Convention on Climate Change. It addressed the problem of anthropogenic climate change by requiring developed countries to set legally binding emission reduction targets for greenhouse gases.</p>	<p>Industrial nations agreed to reduce their collective emissions of greenhouse gases by 5.2% from 1990 levels by the period 2008 to 2012. Countries can achieve their Kyoto targets by:</p> <ul style="list-style-type: none"> ▪ Reducing greenhouse gas emissions in their own country ▪ Implementing projects to reduce emissions in other countries <p>Trading in carbon. Countries that have achieved their Kyoto targets will be able to sell their excess carbon allowances to countries finding it more difficult or too expensive to meet their targets</p>	<p>The plan needs to include policies that encompass the broad goals of the Kyoto Protocol, e.g. recognising that local action needs to be taken with regards to climate change issues.</p>	<p>The SA should ensure that the Local Plan conforms to the broad goals and aims of the Kyoto Protocol and include appropriate objectives, indicators and targets in the SA Framework.</p>
Second European Climate Change Programme (ECCP II) 2005			
<p>Initiated in 2005, the programme builds on the First Climate Change Programme and seeks to continue to drive climate change mitigation across Europe, with the aim of limiting climate change and meeting Kyoto targets. It also seeks to promote adaptation to the effects of inevitable and predicted climate change.</p>	<p>Most initiatives in the programme refer to EU-wide elements of policy related, for example, to emissions trading, technological specifications and carbon capture and storage.</p> <p>There are therefore no specific targets or indicators of relevance.</p>	<p>The plan and allocations should take account of the need to understand and adapt to the potential impacts of climate change such as weather extremes and coastal flooding.</p>	<p>The SA Framework should include a target to contribute towards the mitigation and adaption of the effects of climate change.</p>
IPCC Fifth Assessment Synthesis Report (November 2014)			
<p>The report demonstrates the need and strategic considerations for both adaptation and global-scale mitigation to manage risks from climate</p>	<p>No specific targets or indicators are included. It's been acknowledged that many adaptation and mitigation</p>	<p>The plan and allocations should take account of the</p>	<p>The SA Framework should include a target to</p>

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
change. Building on these insights, the report presents near-term response options that could help achieve such strategic goals. Near-term adaptation and mitigation actions will differ across sectors and regions, reflecting development status, response capacities, and near- and long-term aspirations with regard to both climate and non-climate outcomes. Because adaptation and mitigation inevitably take place in the context of multiple objectives, particular attention is given to the ability to develop and implement integrated approaches that can build on co-benefits and manage trade-offs.	options can help address climate change, but no single option is sufficient by itself. Effective implementation depends on policies and cooperation at all scales, and can be enhanced through integrated responses that link mitigation and adaptation with other societal objectives.	need to understand and adapt to the potential impacts of climate change such as weather extremes and coastal flooding.	contribute towards the mitigation and adaption of the effects of climate change.
Directive to Promote Electricity from Renewable Energy (2001/77/EC) (as amended by 2001/77/EC, 2003/30/EC and 2009/28/EC)			
<p>This Directive aims to promote an increase in the contribution of renewable energy sources to electricity production in the internal market for electricity and to create a basis for a future Community Framework.</p> <p>Member States are obliged to take steps to increase the consumption of electricity produced from renewable energy sources, by setting national indicative targets, in terms of a percentage of electricity consumption by 2010.</p>	<p>Member States are obliged to take appropriate steps to encourage greater consumption of electricity produced from renewable energy sources in conformity with the national indicative targets.</p> <p>Global indicative target: 12% of gross national energy consumption by 2010 and 22.1% indicative share of electricity produced from renewable energy sources in total Community electricity consumption by 2010.</p> <p>UK target: renewables to account for 10% of UK consumption by 2010.</p>	The plan should recognise the importance of renewable energy and the need to increase the consumption of electricity produced from renewable energy sources.	The SA Framework should include objectives to cover the action areas and encourage energy efficiency.
European Transport Policy for 2010: A Time to Decide			
This policy outlines the need to improve the quality and effectiveness of transport in Europe. A strategy has been proposed which is designed to gradually break the link between transport growth and economic growth to reduce environmental impacts and congestion. The policy advocates measures that promote an environmentally friendly mix of transport services.	There are no specific indicators or targets of relevance.	The development of the plan should consider issues relating to transport and access.	The SA Framework should include objectives relating to the need for a sustainable and efficient transport system.
EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)			
<p>The Directive merges four previous directives and one Council decision into a single directive on air quality and may also incorporate Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons at a later date. It sets binding standards and target dates for reducing concentrations of SO₂, NO₂/NO_x, PM₁₀/PM_{2.5}, CO, benzene and lead which are required to be translated into UK legislation.</p> <p>The Directive seeks to maintain ambient-air quality where it is good and improve it in other cases.</p>	Thresholds for pollutants are included in the Directives.	The plan should consider the maintenance of good air quality and the measures that can be taken to improve it. For example, reducing the number of vehicle movements.	The SA Framework should include objectives that address the protection of air quality.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA

International Plans			
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Water Framework Directive (2000/60/EC)			
<p>The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which:</p> <p>(a) prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems</p> <p>(b) promotes sustainable water use based on a long-term protection of available water resources</p> <p>(c) aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances</p> <p>(d) ensures the progressive reduction of pollution of groundwater and prevents its further pollution</p> <p>(e) contributes to mitigating the effects of floods and droughts</p>	<p>Objectives for surface waters:</p> <ul style="list-style-type: none"> ▪ Achievement of good ecological status and good surface water chemical status by 2015 ▪ Achievement of good ecological potential and good surface water chemical status for heavily modified water bodies and artificial water bodies ▪ Prevention of deterioration from one status class to another ▪ Achievement of water-related objectives and standards for protected areas <p>Objectives for groundwater:</p> <ul style="list-style-type: none"> ▪ Achievement of good groundwater quantitative and chemical status by 2015 ▪ Prevention of deterioration from one status class to another ▪ Reversal of any significant and sustained upward trends in pollutant concentrations and prevent or limit input of pollutants to groundwater <p>Achievement of water related objectives and standards for protected areas</p>	<p>The plan should consider how the water environment can be protected and enhanced, and include policies that promote the sustainable use of water resources.</p>	<p>The SA Framework should include objectives that consider effects upon water quality and resource.</p>
Drinking Water Directive (98/83/EC)			
<p>Sets standards for a range of drinking water quality parameters.</p>	<p>The Directive includes standards that constitute legal limits.</p>	<p>The plan should recognise the effects of development on drinking water quality, and provide development and operational controls to prevent non-conformance with values.</p>	<p>The SA Framework should include objectives, indicators and targets that address water quality.</p>
Directive on the Assessment and Management of Flood Risks (2007/60/EC)			
<p>This Directive aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. It</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan and allocations should consider potential</p>	<p>The SA Framework should include objectives</p>

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>requires Member States to assess whether all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas, and to take adequate and coordinated measures to reduce this flood risk.</p> <p>The Directive shall be carried out in co-ordination with the Water Framework Directive, most notably through flood risk management plans and river basin management plans, and also through co-ordination of the public participation procedures in the preparation of these plans.</p>		flood risk, and prevent development within floodplains.	that promote the reduction and management of flood risk.
UN Convention on Biological Diversity (1992)			
<p>This was one of the main outcomes of the 1992 Rio Earth Summit. The key objectives of the Convention are:</p> <ul style="list-style-type: none"> ▪ The conservation of biological diversity ▪ The sustainable use of its components ▪ The fair and equitable sharing of the benefits arising from the use of genetic resources <p>The achievement of the objectives in the Convention relies heavily upon the implementation of action at the national level.</p>	The Convention aims to halt the worldwide loss of animal and plant species and genetic resources and save and enhance biodiversity.	It is essential that the development of the plan should consider biodiversity protection.	The SA Framework should include objectives relating to the protection of biodiversity.
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)			
<p>The principle objectives of the Convention are to conserve wild flora and fauna and their natural habitats, especially those species and habitats whose conservation requires the co-operation of several States, and to promote such co-operation. Particular emphasis is given to endangered and vulnerable species, including migratory species.</p> <p>In order to achieve this the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1000 wild animal species.</p> <p>Each Contracting Party is obliged to:</p> <ul style="list-style-type: none"> ▪ Promote national policies for the conservation of wild flora, wild fauna and natural habitats, with particular attention to endangered and vulnerable species, especially endemic ones, and endangered habitats, in accordance with the provisions of this Convention ▪ Have regard to the conservation of wild flora and fauna in its planning and development policies and in its measures against pollution 	There are no specific targets or indicators of relevance.	The plan must take into account the habitats and species that have been identified under the Convention, and should include provision for the preservation, protection and improvement of the quality of the environment as appropriate.	The SA Framework should take into account the conservation provisions of the Convention, including provision for the preservation and protection of the environment.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<ul style="list-style-type: none"> Promote education and disseminate general information on the need to conserve species of wild flora and fauna and their habitats 			
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)			
<p>The Convention is an intergovernmental treaty under the United Nations Environment Programme. The aim is for contracting parties to work together to conserve terrestrial, marine and avian migratory species and their habitats (on a global scale) by providing strict protection for endangered migratory species.</p> <p>The overarching objectives set for the Parties are:</p> <ul style="list-style-type: none"> Promote, co-operate in and support research relating to migratory species Endeavour to provide immediate protection for migratory species included in Appendix I <p>Endeavour to conclude Agreements covering the conservation and management of migratory species included in Appendix II</p>	There are no specific targets or indicators of relevance.	The plan must take into account the habitats and species that have been identified under this directive, and should include provision for their protection, preservation and improvement.	The SA Framework should include objectives protecting biodiversity.
EU Birds Directive (2009/147/EC)			
<p>The directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds. The Directive places great emphasis on the protection of habitats for endangered as well as migratory species (listed in Annex I), especially through the establishment of a coherent network of Special Protection Areas (SPAs) comprising all the most suitable territories for these species.</p>	There are no specific targets or indicators of relevance.	The development of the plan must consider the preservation / enhancement of biodiversity resources including the protection of bird species.	The SA Framework should include sustainability objectives, indicators and targets for the preservation /enhancement of biodiversity resources.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)			
Directive seeks to conserve natural habitats, and wild fauna and flora within the EU.	<p>Member States are required to take measures to maintain or restore at favourable conservation status, natural habitats and species of Community importance. This includes Special Areas of Conservation and Special Protection Areas and it is usually accepted as also including Ramsar sites (European Sites).</p> <p>Plans that may adversely affect the integrity of European sites may be required to be subject to Appropriate Assessment under the Directive.</p>	The plan must take into account the habitats and species that have been identified under this directive, and should include provision for the preservation, protection and improvement of the quality of the environment as appropriate.	<p>The SA should include the conservation provisions of the Directive, and include objectives that address the protection of biodiversity.</p> <p>When required, a Habitats Regulations Assessment Screening exercise should be undertaken.</p>
Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)			
<p>The Convention is an intergovernmental treaty whose stated mission is 'the conservation and wise use of all wetlands through local, regional and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world' (Ramsar COP8, 2002).</p> <p>There are presently 150 Contracting Parties to the Convention, with 1556 wetland sites, totalling 129.6 million hectares, designated for inclusion in the Ramsar List of Wetlands of International Importance</p> <p>The original emphasis was on the conservation and wise use of wetlands primarily to provide habitat for waterbirds, however over the years the Convention has broadened its scope to incorporate all aspects of wetland conservation and wise use, recognising wetlands as ecosystems that are extremely important for biodiversity conservation and for the well-being of human communities.</p>	<p>There are no specific targets. Although now out of date, the general objectives of the Ramsar Strategic Plan 2003-2008 are:</p> <ul style="list-style-type: none"> ▪ To ensure the wise use of wetlands ▪ To achieve appropriate management of wetlands of international importance ▪ To promote international co-operation ▪ To ensure that the required implementation mechanisms, resources and capacity are in place <p>To progress towards the accession of all countries to the Convention.</p>	The plan needs to include policies that seek to protect designated sites for nature conservation, including Ramsar sites.	The SA Framework must incorporate the overarching principals of the Convention.
EU Biodiversity Strategy (1998)			

International Plans			
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The Strategy aims to anticipate, prevent and attack the causes of significant reduction or loss of biodiversity at the source, which will help both to reverse present trends in biodiversity decline and to place species and ecosystems, including agro-ecosystems, at a satisfactory conservation status, both within and beyond the territory of the EU.	There are no specific indicators or targets of relevance.	It is essential that the development of the plan should consider biodiversity protection.	The SA Framework should include sustainability objectives, indicators and targets that address biodiversity.
European Landscape Convention (2000)			
The aims are to promote European landscape protection, management and planning, and to organise European co-operation on landscape issues. The Convention is part of the Council of Europe's work on natural and cultural heritage, spatial planning, environment and local self-government, and establishes the general legal principles which should serve as a basis for adopting national landscape policies and establishing international co-operation in such matters. The UK is a signatory to this Convention and is committed to its principles.	There are no specific indicators or targets of relevance.	The plan needs to consider the preservation and enhancement of the landscape.	The SA Framework should include objectives that relate to landscape protection.
UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972)			
The Convention requires that cultural and natural heritage is identified, protected, conserved, presented and transmitted to future generations. It also requires that effective and active measures are taken to protect and conserve cultural and natural heritage.	There are no specific indicators or targets of relevance.	The plan needs to consider preservation and enhancement of cultural and natural heritage.	The SA Framework should include objectives relating to the protection of historic and natural resources.
Waste Framework Directive (2008/98/EC)			
This replaces the old Waste Framework Directive (2006/12/EC). The aims of this Directive are: <ul style="list-style-type: none"> To provide a comprehensive and consolidated approach to the definition and management of waste. To shift from thinking of waste as an unwanted burden to a valued resource and make Europe a recycling society. To ensure waste prevention is the first priority of waste management. To provide environmental criteria for certain waste streams, to establish when a waste ceases to be a waste (rather than significantly amending the definition of waste).	There are no specific targets or indicators of relevance.	The plan should seek to promote the key objectives of prevention, recycling and processing of waste, conversion of waste to usable materials, and energy recovery.	The SA needs to incorporate objectives, indicators and targets that address waste issues, e.g. minimisation and re-use etc.
Packaging and Packaging Waste Directive (94/62/EC) (as amended by 2004/12/EC and 2005/20/EC)			

International Plans			
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This Directive covers all packaging placed on the market in the Community and all packaging waste, whether it is used or released at industrial, commercial, office, shop, service, household or any other level, regardless of the material used. The Directive provides that the Member States shall take measures to prevent the formation of packaging waste, which may include national programmes and may encourage the reuse of packaging.	The Directive states that Member States must introduce systems for the return and/or collection of used packaging to attain certain targets. However, all targets are now out of date and are therefore not included.	Although this Directive dictates national legislation, the plan should encourage better waste management.	The SA Framework should be consistent with the waste management principles of this policy.
Urban Waste Water Treatment Directive 91/271/EEC (as amended by 98/15/EC)			
This Directive concerns the collection, treatment and discharge of urban waste water and the treatment and discharge of waste water from certain industrial sectors. Its aim is to protect the environment from any adverse effects caused by the discharge of such waters.	The Directive establishes a timetable, which Member States must adhere to, for the provision of collection and treatment systems for urban waste water in agglomerations corresponding to the categories laid down in the Directive. However, all deadlines have since passed and are therefore not included.	The plan should seek to promote the appropriate collection, treatment and discharge of urban wastewater to protect the environment.	The SA needs to incorporate objectives, indicators and targets that complement those of this strategy.
SEA Directive 2001/42/EC			
The directive concerns the SEA procedure, which is as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared. As regards plans and programmes which are likely to have significant effects on the environment in another Member State, the Member State in whose territory the plan or programme is being prepared must consult the other Member State(s). On this issue the SEA Directive follows the general approach taken by the SEA Protocol to the UN ECE Convention on Environmental Impact Assessment in a Transboundary Context.	There are no specific targets or indicators of relevance.	The plan is required to be subject to SEA under the SEA Directive.	An SEA will be undertaken on the plan.

Summary of National Plans and Programmes

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)			
<p>The strategy for sustainable development aims to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.</p> <p>As a result of the 2004 consultation to develop new UK sustainable development strategy the following issues have been highlighted as the main priority areas for immediate action:</p> <ul style="list-style-type: none"> ▪ Sustainable consumption and production - working towards achieving more with less ▪ Natural resource protection and environmental enhancement - protecting the natural resources on which we depend ▪ From local to global: building sustainable communities creating places where people want to live and work, now and in the future ▪ Climate change and energy - confronting the greatest threat <p>In addition to these four priorities changing behaviour also forms a large part of the Governments thinking on sustainable development.</p>	<p>Because the UK sustainable development strategy aims to direct and shape policies, it is difficult to list the objectives of the strategy within the confines of the table. The following principles will be used to achieve the sustainable development purpose, and have been agreed by the UK Government, Scottish Executive, Welsh Assembly Government, and the Northern Ireland Administration:</p> <ul style="list-style-type: none"> ▪ Living within environmental limits ▪ Ensuring a strong, healthy, and just society ▪ Achieving a sustainable economy ▪ Promoting good governance ▪ Using sound science responsibly <p>There are no specific targets within the Strategy, although it makes reference to targets set in related PSA and other relevant policy statements.</p> <p>There are also 68 high level UK Government strategy indicators, which will be used to measure the success with which the above objectives are being met. The most relevant are:</p> <ul style="list-style-type: none"> ▪ Greenhouse gas emissions: Kyoto target and CO₂ emissions ▪ CO₂ emissions by end user: industry, domestic, transport (excluding international aviation), other ▪ Renewable electricity: renewable electricity generated as a % of total electricity ▪ Energy supply: UK primary energy supply and gross inland energy consumption ▪ Water resource use: total abstractions from non-tidal surface and ground water sources ▪ Waste arisings by (a) sector (b) method of disposal 	<p>The plan needs to take on board the key objectives of the strategy and contribute to the development of more sustainable communities by creating places where people want to live and work.</p>	<p>The SA Framework should include objectives, indicators and targets that complement those of this strategy.</p>

National Plans			
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	<ul style="list-style-type: none"> ▪ Bird populations: bird population indices (a) farmland birds (b) woodland birds (c) birds of coasts and estuaries (d) wintering wetland birds ▪ Biodiversity conservation: (a) priority species status (b) priority habitat status ▪ River quality: rivers of good (a) biological (b) chemical quality ▪ Air quality and health: (a) annual levels of particles and ozone (b) days when air pollution is moderate or higher 		
Sustainable Communities: Building for the Future (2003)			
<p>This action programme marks a step change in the policies for delivering sustainable communities for all. The plan allies measures to tackle the housing provision mis-match between the South-East and parts of the North and the Midlands, with more imaginative design and the continuation of an agreeable and convenient environment.</p> <p>It is part of the Government's wider drive to raise the quality of life in our communities through increasing prosperity, reducing inequalities, increasing employment, better public services, better health and education, tackling crime and anti-social behaviour, and much more. It reflects our key principles for public service reform: raising standards, devolving and delegating decision-making, providing greater flexibility over use of resources and choice for customers. The main elements are:</p> <ul style="list-style-type: none"> ▪ Sustainable communities ▪ Step change in housing supply ▪ New growth areas ▪ Decent homes <p>Countryside and local environment</p>	There are no specific indicators or targets of relevance.	<p>The plan should encourage housing to be addressed by local partnerships as part of a wider strategy of neighbourhood renewal and sustainable communities.</p> <p>It should also encourage environmental enhancement to be central to regeneration solutions, including the use of green space networks as a basis for development and have due regard for landscape character and designations.</p>	<p>The SA should acknowledge local action to meet local needs.</p> <p>It should recognise that housing should be provided for all sections of society.</p> <p>It should recognise that environmental improvements can improve quality of life</p> <p>The SA Framework should be reviewed against these objectives.</p>
Planning Act 2008			

National Plans			
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<p>The Act created amendments to the functioning of the planning system, following recommendations from the Barker Review first proposed in the 2007 White Paper: Planning for a Sustainable Future. The two principal changes are:</p> <ul style="list-style-type: none"> ▪ The establishment of an Infrastructure Planning Commission to make decisions on nationally significant infrastructure projects. <p>Creation of the Community Infrastructure Levy, a charge to be collected from developers by local authorities for the provision of local and sub-regional infrastructure.</p>	There are no specific targets or indicators of relevance.	The preparation of the plan should consider the recommended actions in this document.	The SA should consider the means by which the measures in the Act may enable the plan to contribute towards sustainable development
Environmental Quality in Spatial Planning 2005			
<p>This document was jointly published by The Countryside Agency, Historic England, English Nature and the EA. It provides guidance to help in the preparation of Regional Spatial Strategies and Local Development Frameworks, by ensuring incorporation of the natural, built and historic environment, and rural issues in plans and strategies.</p>	There are no specific targets or indicators of relevance.	The preparation of the plan should consider the recommended actions in this document.	The SA should take into consideration the issues raised in this document and ensure that an appropriate suite of objectives is developed, covering relevant aspects of the built and natural environment.
World Class Places: The Government's Strategy for Improving Quality of Place (2009)			

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>The Strategy identifies the benefits of creating well-designed places, including elements of spatial planning, urban design, architecture, green infrastructure and community involvement. It seeks to promote the consideration of place at all levels of planning. An Action Plan accompanying the Strategy sets out the following seven broad objectives</p> <p>1: Strengthen leadership on quality of place at the national and regional level</p> <p>2: Encourage local civic leaders and local government to prioritise quality of place</p> <p>3: Ensure relevant government policy, guidance and standards consistently promote quality of place and are user-friendly</p> <p>4: Put the public and community at the centre of place-shaping</p> <p>5: Ensure all development for which central government is directly responsible is built to high design and sustainability standards and promotes quality of place</p> <p>6: Encourage higher standards of market-led development</p> <p>7: Strengthen quality of place skills, knowledge and capacity</p>	<p>The majority of actions reflect how the Government will take forward the strategy and use it in the creation of new guidance and to direct its interactions with relevant agencies. However, of particular relevance are:</p> <p>2.3: Working with local authorities to achieve high quality development</p> <p>2.5: Establishing an award scheme for high quality places</p> <p>4.1: Encouraging public involvement in shaping the vision for their area and the design of individual schemes</p> <p>4.2: Ensuring the citizens and service users are engaged in the design and development of public buildings</p> <p>4.3: Encouraging community involvement in ownership and managing the upkeep of the public realm and community facilities</p> <p>4.4: Promoting public engagement in creating new homes and neighbourhoods</p> <p>6.1: Encouraging local authorities to set clear quality of place ambitions in their local planning framework</p> <p>7.1: Strengthening advisory support on design quality for local authorities, the wider public sector and developers</p> <p>7.2: Encouraging local authorities to share planning, design, conservation and related expertise</p>	<p>The plan should seek to reinforce and promote a sense of place. High standards of design and public consultation should be encouraged.</p>	<p>The SA Framework should recognise the importance of developing a high quality built environment and promoting high levels of community involvement.</p>
The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development (2005)			
<p>This document was jointly published by the Countryside Agency and Groundwork, in 2005.</p> <p>The document presents a new vision for a very extensive and often overlooked resource – the countryside in and around England's towns and cities. The vision at the heart of the challenge to reduce the pressures that urban life places on the local and global environment is, <i>'the need to ensure a high quality of life for all while at the same time reducing our collective impact on the resources we share'</i>.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan needs to complement the aims of the strategy and seek to develop sustainable communities.</p>	<p>The SA Framework should include objectives, indicators and targets that seek to promote sustainable communities.</p>

National Plans			
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Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)			
<p>The strategy aims to halve the number of households living in insecure temporary accommodation by 2010. This will be achieved by:</p> <ul style="list-style-type: none"> ▪ Preventing homelessness ▪ Providing support for vulnerable people ▪ Tackling the wider causes and symptoms of homelessness ▪ Helping more people move away from rough sleeping ▪ Providing more settled homes <p>For each of the above points a series of actions are identified.</p>	<p>Key target:</p> <p>Halve the number of households living in temporary accommodation by 2010</p>	<p>The plan should understand the causes of homelessness and seek to include guidance that includes homes to meet the needs of the local population.</p>	<p>The SA Framework should include objectives that address housing issues including homelessness.</p>
Climate Change Act (2008)			

National Plans			
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<p>The Act commits the UK to action in mitigating the impacts of climate change. It has two key aims:</p> <ul style="list-style-type: none"> ▪ To improve carbon management, helping the transition towards a low-carbon economy <p>To demonstrate UK leadership internationally, signalling a commitment to take our share of responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in December 2009 [and beyond].</p>	<p>Relevant commitments within the Act are:</p> <ul style="list-style-type: none"> ▪ The creation of a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad (against 1990 levels). Also a reduction in emissions of at least 34% by 2020. ▪ A carbon budgeting system which caps emissions over five-year periods, to aid progress towards the 2050 target. ▪ The creation of the Committee on Climate Change - a new independent, expert body to advise the Government on the level of carbon budgets and on where cost-effective savings can be made. ▪ The inclusion of International aviation and shipping emissions in the Act or an explanation to Parliament why not - by 31 December 2012. ▪ Further measures to reduce emissions, including: powers to introduce domestic emissions trading schemes more quickly and easily through secondary legislation; measures on biofuels; powers to introduce pilot financial incentive schemes in England for household waste; powers to require a minimum charge for single-use carrier bags (excluding Scotland). ▪ New powers to support the creation of a Community Energy Savings Programme. 	<p>The plan should ensure that policies are in place to encourage the reduction in CO₂ emissions whilst promoting sustainable economic growth.</p>	<p>The SA Framework should include objectives that address climate change issues including flooding and the need to reduce greenhouse gas emissions.</p>

National Plans			
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Stern Review of the Economics of Climate Change (2006)			
<p>The review examines the evidence on the economic impacts of climate change and explores the economics of stabilising greenhouse gases in the atmosphere. The second part of the review considers the complex policy challenges involved in managing the transition to a low-carbon economy and in ensuring that societies are able to adapt to the consequences of climate change.</p> <p>The document clearly identifies that adaptation is the only available response for impacts that will occur over the next few decades.</p>	There are no specific targets or indicators of relevance.	The plan should ensure that policies are in place to encourage the reduction in CO ₂ emissions whilst promoting sustainable economic growth.	The SA Framework should include an objective relating to the reduction in greenhouse gas emissions.
UK Carbon Plan (2011)			
The Carbon Plan sets out the Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the UK's 2050 target. The publication brings together the Government's strategy to curb greenhouse gas emissions and deliver climate change targets.	The Carbon Plan includes the following targets: Commitment to reduce carbon emissions by at least 80% by 2050.	It should be ensured that reducing carbon emissions is a key theme throughout the plan.	The SA Framework should include objectives that complement the priorities of this Plan.
Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)			
<p>The report examines ways in which the land use planning system can help biodiversity adapt to climate change. Strategies are identified that enable LDFs to deliver against the Department for Food, Environment and Rural Affairs' (Defra) 12 core adaptation goals:</p> <ol style="list-style-type: none"> 1. Conserve existing biodiversity <ol style="list-style-type: none"> 1a Conserve protected areas and other high quality habitats 1b Conserve range and ecological variability of habitats and species 2 Reduce sources of harm not linked to climate 3 Develop ecologically resilient and varied landscapes <ol style="list-style-type: none"> 3a Conserve and enhance local variation within sites and habitats 3b Make space for the natural development of rivers and coasts 4 Establish ecological networks through habitat protection, restoration and creation 5 Make sound decisions based on analysis <ol style="list-style-type: none"> 5a Thoroughly analyse causes of change 5b Respond to changing conservation priorities 6 Integrate adaptation and mitigation measures into conservation management, planning and practice 	There are no specific targets or indicators of relevance.	Development of the plan should include recommendations from this report. Biodiversity assets should be protected from inappropriate development and i.e. use of buffer zones around sensitive sites.	The SA should refer to specific guidance in the document for using SA to improve the ability of biodiversity to adapt to climate change.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
Planning for Climate Change – Guidance and Model Policies for Local Authorities (2010)			
<p>The document has been produced by the Planning and Climate Change Coalition, a group of organisations seeking to ensure that the planning system responds effectively to the climate challenge.</p> <p>The guide is designed to provide clarity and guidance to local authorities and Local Enterprise Partnerships on how best to plan for climate change, both in terms of reducing CO₂ emissions, and adapting to future climatic conditions.</p> <p>Guidance is provided on developing both strategic and development control policies.</p>	<p>There are no specific targets or indicators of relevance, other than to support local authorities in mitigating and adapting to climate change.</p>	<p>The guidance should be followed when developing Local Plan in order to address climate change issues.</p>	<p>The SA should examine the likely effectiveness of the plan in mitigating and adapting to climate change. Such judgements should be made with reference to the guidance.</p>
Energy White Paper: Meeting the Energy Challenge (2007)			
<p>This White Paper sets out a framework for action to address the following long-term energy challenges, and helps to manage the risks:</p> <ul style="list-style-type: none"> ▪ Tackling climate change by reducing CO₂ emissions both within the UK and abroad ▪ Ensuring secure, clean and affordable energy as we become increasingly dependent on imported fuel <p>As set out in ‘The Energy Challenge’ published in 2006, the context in which the Government is seeking to meet these challenges is evolving.</p> <p>This paper sets out the Government’s international and domestic energy strategy (based upon existing policies) to address the long-term energy challenges and deliver the four energy policy goals [set out in the 2003 Energy White Paper]. It sets out how the Government is implementing the measures in the Energy Review Report in 2006 together with other measures announced since (e.g. in the 2007 Budget).</p>	<p>Targets are superseded by 2008 Climate Change Act. There is therefore none of relevance.</p>	<p>The plan should encourage the reduction in CO₂ emissions whilst promoting sustainable economic growth.</p>	<p>The SA Framework should include an objective relating to the reduction in greenhouse gas emissions.</p>
Energy Act 2013			
<p>The Act sets out new legislation to:</p> <ul style="list-style-type: none"> ▪ Reflect the availability of new technologies (such as CCS and emerging renewable technologies) ▪ Correspond with our changing requirements for security of supply infrastructure (such as offshore gas storage) ▪ Ensure adequate protection for the environment and the tax payer as our energy market changes. 	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan should ensure that policies are in place to encourage the reduction in CO₂ emissions whilst promoting sustainable economic growth.</p>	<p>The SA Framework should include an objective relating to minimising greenhouse gas emissions.</p>

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Planning and Energy Act 2008			
<p>The Planning and Energy Act 2008 allows local authorities to include policies in their local development plans setting out reasonable requirements for:</p> <ul style="list-style-type: none"> ▪ A proportion of energy used in development in their area to be energy from renewable sources ▪ A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development 	There are no specific targets or indicators of relevance.	The plan should seek to ensure that policies encourage development that incorporates the use of renewable energy.	The SA Framework should include targets and an objective relating to renewable energy within development.
Delivering a Sustainable Transport System (2008)			
<p>The document explains how the strategic aims set out in 'Towards a Sustainable Transport System' (2007) will be translated into policy and practical actions. It takes on recommendations contained in the Eddington transport study and the Stern Review. The 5 goals are:</p> <ul style="list-style-type: none"> ▪ To support national economic competitiveness and growth, by delivering reliable and efficient transport networks; ▪ To reduce transport's emissions of CO₂ and other greenhouse gases, with the desired outcome of tackling climate change; ▪ To contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health; ▪ To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society; and <p>To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</p>	The document does not contain specific targets or indicators, but rather sets out broad strategic priorities at a national level. Nonetheless, the goals provide a framework for local as well as national action.	The plan should recognise the importance of safe, reliable and efficient transport systems to economic and social wellbeing. The sustainability impacts of transport should also be fully understood.	The SA Framework should ensure inclusion of objectives that promote sustainable transport.
The Future of Transport White Paper – A Network for 2030 (2004)			
<p>This Paper builds on the progress that has already been made since the implementation of the 10 Year Plan for transport, and sets out the vision for transport for the next 30 years, until 2015, with a funding commitment. It is a long term strategy for a modern, efficient and sustainable transport system backed up by sustained high levels of investment.</p> <p>The aim is for a transport network that can meet the challenges of a growing economy and the increasing demand for travel, but that can also achieve environmental objectives. This means coherent networks with:</p>	<p>The document indicates a number of Public Service Agreement objectives. Those of relevance include;</p> <ul style="list-style-type: none"> ▪ Reduce greenhouse gas emissions to 12.5% below 1990 levels in line with our Kyoto commitment and move towards a 20% reduction in CO₂ emissions below 1990 levels by 2010, through measures including energy efficiency and renewables. ▪ Improve air quality by meeting the Air Quality Strategy targets for carbon monoxide, lead, nitrogen 	The plan should recognise the need for an integrated and sustainable transport network.	The SA Framework should contain objectives that support an efficient and sustainable transport system, and also cover issues relating to the protection of air quality and greenhouse gas emissions.

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<ul style="list-style-type: none"> The road network providing a more reliable and freer-flowing service for both personal travel and freight, with people able to make informed choices about how and when they travel The rail network providing a fast, reliable and efficient service, particularly for interurban journeys and commuting into large urban areas Reliable, flexible, convenient bus services tailored to local needs Making walking and cycling a real alternative for local trips Ports and airports providing improved international and domestic links <p>The strategy is built around three key themes:</p> <ul style="list-style-type: none"> Sustained investment over the long term Improvements in transport management Planning ahead sustained <p>Underlining these themes, and an important underlying objective of our strategy, is balancing the need to travel with the need to improve quality of life. This means seeking solutions that meet long term economic, social and environmental goals. Achieving this objective will contribute to the objectives of the UK Sustainable Development Strategy.</p>	dioxide, particles, sulphur dioxide, benzene and 1,3 butadiene.		
Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport (July 2009)			
The Strategy sets out how the transport sector will meet its emissions reduction obligations and contribute to the Government's overall policy on climate change as set out in the Climate Change Act 2008.	The Strategy does not contain its own targets; rather it sets out how those committed to elsewhere, notably in the Climate Change Act 2008, will be met by the transport sector and what actions the Government will take to see they are met.	The plan should promote low-carbon transport. This may require the use of new and emerging technology as well as promoting a modal shift in transport choices.	The SA should seek the promotion of low-carbon forms of transport.
Wildlife and Countryside Act (1981) (as amended)			
The Act still forms the basis of conservation legislation in Great Britain, although it has been much modified. Schedules 5 and 8 of the Act detail lists of legally protected wild animals and plants respectively. These are updated every five years.	There are no specific targets or indicators of relevance.	The plan must ensure that the requirements of the Act are complied with and that species and habitats are protected.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
The Conservation of Habitats and Species Regulations (2010)			

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The purpose of the Act is to create a new statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen nature conservation legislation, and to facilitate better management of Areas of Outstanding Natural Beauty (AONBs).	There are no specific targets or indicators of relevance.	It is essential that the development of the plan should consider biodiversity protection.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
The Countryside and Rights of Way (CRoW) Act (2000)			
The purpose of the Act is to create a new statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen nature conservation legislation, and to facilitate better management of Areas of Outstanding Natural Beauty (AONBs).	There are no specific targets or indicators of relevance.	It is essential that the development of the plan should consider biodiversity protection.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
The Natural Environment and Rural Communities Act (2006)			
<p>The act created Natural England and the Commission for Rural Communities and, amongst other measures, it extended the biodiversity duty set out in the Countryside and Rights of Way (CROW) Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity.</p> <p>The Duty is set out in Section 40 of the Act, and states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.</p> <p>The aim of the biodiversity duty is to raise the profile of biodiversity in England and Wales, so that the conservation of biodiversity becomes properly embedded in all relevant policies and decisions made by public authorities.</p> <p>The Duty applies to all local authorities, community, parish and town councils, police, fire and health authorities and utility companies.</p> <p>The Government has produced guidance on implementing the Duty, contained in two publications, one for Local Authorities (and the other for other public bodies).</p> <p>Section 41 of the NERC Act 2006, lists species and habitats of principal importance that local authorities must have regard for.</p>	There are no specific targets or indicators of relevance.	It is essential that the development of the plan considers the provisions of the biodiversity duty.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)			

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<p>This guidance was issued by Defra and the Welsh Assembly to assist local authorities in fulfilling their Biodiversity Duty.</p>	<p>The guidance references a biodiversity indicator, which was developed as a result of a Defra commissioned research project in 2003/4. The indicator developed to measure local authority performance is:</p> <p>'Progress towards achieving a local authority's potential for biodiversity', which is based on four sub-indicators relating to:</p> <ul style="list-style-type: none"> ▪ The management of local authority landholdings (e.g. % of landholdings managed to a plan which seeks to maximise the sites' biodiversity potential. ▪ The condition of local authority managed SSSIs (e.g. % of SSSI in 'favourable' or 'unfavourable recovering' condition). ▪ The provision of accessible greenspace. ▪ The effect of development control decisions on designated sites (e.g. change in designated sites as a result of planning permissions). 	<p>It is essential that the development of the plan considers the provisions of the biodiversity duty.</p>	<p>The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.</p>
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)			
<p>This new, ambitious biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes)⁵ and at sea. It builds on the successful work that has gone before, but also seeks to deliver a real step change.</p> <p>The mission for this strategy, for the next decade, is:</p> <ul style="list-style-type: none"> • To halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. 	<p>The document sets out 5 strategic goals which include targets in which flexible framework is given to inform the establishment of national plans, taking into account national circumstances and priorities.</p> <ul style="list-style-type: none"> • Strategic goal A: address the underlying causes of biodiversity loss by mainstreaming biodiversity cross government and society • Strategic goal B: reducing the direct pressures on biodiversity and promote sustainable use • Strategic goal C: improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity • Strategic goal D: enhance the benefits to all from biodiversity and ecosystem services 	<p>It is essential that the development of the plan should consider biodiversity protection.</p>	<p>The SA Framework should include objectives relating to the protection of biodiversity resources</p>

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	<ul style="list-style-type: none"> Strategic goal E :enhance implementation through participatory planning, knowledge management and capacity building 		
Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association) (2004)			
The aim of the guide is to provide guidance on how to maximise the opportunities for biodiversity in the planning and design of sustainable communities. The guidance is designed to apply at a variety of scales from whole sub-region growth points, to neighbourhood schemes.	This is a guidance document and therefore does not set targets or identify indicators.	The plan should recognise the multi-functional nature of open space. The plan should seek to protect and enhance biodiversity resources and open space.	The SA Framework should seek to protect European, national and locally designated sites along with areas of open space.
UK Post-2010 Biodiversity Framework 2012			
This framework was produced to set out the common purpose and shared priorities of members to address biodiversity loss and decline in the UK.	<p>The document sets out four key strategic targets:</p> <ul style="list-style-type: none"> Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society. This goal includes targets for public awareness, integrating biodiversity Reduce the direct pressures on biodiversity and promote sustainable use. To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity. <p>Enhance the benefits to all from biodiversity and ecosystems.</p>	The plan should recognise the importance of arresting biodiversity decline and aim to protect and enhance it.	The SA should contain objectives relating to arresting biodiversity loss/decline.

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Biodiversity Indicators in Your Pocket (2010) Defra			
<p>These indicators show changes in aspects of biodiversity such as the population size of important species or the area of land managed for wildlife. They provide part of the evidence to assess whether the targets set out in the following column have been achieved.</p>	<p>The UK Government committed to two important international targets to protect biodiversity:</p> <ol style="list-style-type: none"> 1. In 2001, European Union Heads of State or Government agreed that biodiversity decline should be halted, with the aim of reaching this objective by 2010. 2. In 2002, Heads of State at the United Nations World Summit on Sustainable Development committed themselves to achieve, by 2010, a significant reduction of the current rate of biodiversity loss at the global, regional and national level, as a contribution to poverty alleviation and to the benefit of all life on Earth. <p>There are eighteen UK biodiversity indicators grouped under six focal areas aligned to those used by the Convention on Biological Diversity:</p> <ol style="list-style-type: none"> 1. Status and trends in components of biodiversity 2. Sustainable use 3. Threats to biodiversity 4. Ecosystem integrity and ecosystem goods and services 5. Status of resource transfers and use 6. Public awareness and participation 	<p>The plan should include indicators relating to biodiversity in order to monitor progress.</p>	<p>The SA Framework should include objectives relating to biodiversity and the quality of the natural environment.</p>
A Strategy for England's Trees, Woodlands and Forests (2007)			
<p>The strategy has a 10 – 15 year timescale and strives to achieve sustainable forest management.</p> <p>There are five aims identified for Government intervention in trees, woods and forests. The aims are:</p> <ul style="list-style-type: none"> ▪ To provide a resource of trees, woods and forests where they can contribute most in terms of environmental, economic and social benefits now and in the future. ▪ To ensure that existing and newly-planted trees, woods and forests are resilient to the impacts of climate change and also contribute to the way in which biodiversity and natural resources adjust to climate change. 	<p>There are no specific targets or indicators of relevance.</p>	<p>It is essential that the development of the plan should consider biodiversity protection.</p>	<p>The SA Framework should include objectives relating to the protection of biodiversity resources, which includes areas of woodland, particularly ancient woodland.</p>

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<ul style="list-style-type: none"> To protect and enhance the environmental resources of water, soil, air, biodiversity and landscapes and the cultural and amenity values of trees and woodland. To increase the contribution that trees, woods and forests make to the quality of life for those living, working and visiting England. <p>To improve the competitiveness of woodland businesses and to promote new or improved markets for sustainable woodland products.</p>			
Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority, 2009)			
This document offers clear, practical guidance to local authorities and their stakeholders on how to prepare an open space strategy.	There are no specific targets or indicators of relevance.	The plan should recognise the multi-functional benefits of open space.	The SA should consider the potential for impacts on open spaces and opportunities for enhancements.
Heritage in Local Plans: How to create a sound plan under the NPPF (2012)			
This document is a guide to local authorities from Historic England on how to achieve the objectives of the NPPF for the historic environment and thereby pass the test for a sound local plan.	This is an advisory document and does not set targets or identify indicators.	The plan should accommodate the guidance of this document relating to heritage in local planning.	The SA framework should seek to take on the advice of this document in regards to heritage in local planning.
The Geological Conservation Review (GCR) (ongoing)			
The GCR is designed to identify sites of national and international importance needed to show all the key scientific elements of the Earth heritage of Britain. They display sediments, rocks, fossils, and features of the landscape that make a special contribution to our understanding and appreciation of Earth science and the geological history of Britain	There are no specific targets or indicators of relevance.	The plan should recognise the status of GCR sites in the borough and aim to protect this and other geodiversity sites.	The SA should consider potential impacts on geodiversity.
Safeguarding our Soils: A Strategy for England (Defra, 2009)			
<p>Vision: By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.</p> <p>The Strategy sets out how Government intends to improve the management of soil to manage threats to its quality and integrity.</p>	There are no specific targets or indicators of relevance.	The plan should include measures to ensure that soils are protected in line with the Strategy's aims. In addition the protection of valuable soil resources should be promoted within the plan.	The assessment should consider the extent to which soils may be impacted by proposals supported within the plan.

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Natural England's Green Infrastructure Guidance (2009)			
The guidance outlines the benefits of developing multi-functional green infrastructure. It provides advice to local authorities on how to deliver green infrastructure improvements through the planning system, including reference to LDFs.	There are no specific targets or indicators of relevance.	The plan should protect existing green infrastructure and promote new multi-functional green spaces. Guidance should be followed where possible.	The assessment should consider the impact of plan on the quality and quantity of green infrastructure and the extent to which the guidance has been followed.
Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)			
These publications by Natural England explain and give guidance on the concept of Accessible Natural Green Space Standards (ANGSt). The 2010 report provides practical advice to planning authorities on meeting the standards within new and existing developments.	<p>ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace:</p> <ul style="list-style-type: none"> ▪ of at least 2ha in size, no more than 300m (5 minutes walk) from home; ▪ at least one accessible 20ha site within 2km of home; ▪ one accessible 100ha site within 5km of home; and ▪ one accessible 500ha site within 10km of home; plus a minimum of 1ha of statutory Local Nature Reserves per thousand population. 	The plan should attempt to ensure that the standards are met within the borough.	The SA Framework should contain an objective relating to the provision of green space.

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Heritage White Paper: Heritage protection for the 21st century (2007)			
<p>This White Paper responds to the public call for change, and to this changing policy context. It sets out our vision for a new heritage protection system. Our proposals are based on a unified vision of the historic environment that enables a simpler and more efficient system. They are focussed on opening up heritage protection to greater public scrutiny and involvement. And they recognise that heritage protection needs to be an integral part of a planning system that can deliver sustainable communities.</p>	<p>The proposals in this White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future. They are based around three core principles:</p> <ul style="list-style-type: none"> • Developing a unified approach to the historic environment; • Maximising opportunities for inclusion and involvement; and • Supporting sustainable communities by putting the historic environment at the heart of an effective planning system. 	<p>The plan will need to take on board the issues and themes that have been identified in the document.</p>	<p>The SA Framework should include objectives that relate to the protection and enhancement of the historic environment.</p>
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)			
<p>The Strategy sets out air quality objectives and policy options to further improve air quality in the UK to deliver environmental, health and social benefits.</p> <p>It examines the costs and benefits of air quality improvement proposals, the impact of exceedances of the strategy's air quality objectives, the effect on ecosystems and the qualitative impacts.</p>	<p>The Strategy sets objectives and targets for each air quality pollutant, e.g. to achieve and maintain 40µg/m-3 of annual average nitrogen dioxide.</p>	<p>The plan should consider the maintenance of good air quality and the measures that can be taken to improve it. For example, promotion of Green Travel Plans.</p>	<p>The SA Framework should include objectives that address the protection of air quality.</p>
Water Resources Strategy for England and Wales (2009)			
<p>This is a strategy produced by the Environment Agency (EA) and applies to both England and Wales. It forms the EA's strategy for water resource management for the next 25 years.</p> <p>The focus of the strategy is understanding the present state of water resources and planning for the management of water resources to prevent long-term environmental damage and degradation. The strategy highlights where water abstractions are unsustainable and where further water is needed. The issue of climate change and its impact upon our water resources is also considered.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan needs to consider the protection and enhancement of water resources.</p>	<p>The SA Framework should include objectives that promote the protection of the water environment.</p>

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30 action points are identified to deliver the strategy, which include developing leakage control, encouraging good practice when using water and promoting the value of water.			
Future Water: The Government's Water Strategy for England (2008)			
<p>Defra's vision for the state of the water environment in 2030 is for:</p> <ul style="list-style-type: none"> an improved quality of the water environment and the ecology which it supports, and continued high levels of drinking water quality; sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; sustainable use of water resources, and implemented fair, affordable and cost reflective water charges; reduced greenhouse gas emissions; and an embedded continuous adaptation to climate change and other pressures across the water industry and water users. 	<p>The Strategy contains few quantitative targets. It sets out broad ambitions for improvements in the areas of water demand, supply, quality, surface water drainage, flooding, greenhouse gas emissions, water charging and the regulatory framework.</p> <p>One headline target is to reduce per capita consumption of water to an average of 130 litres per person per day by 2030, or possibly even 120 litres per person per day depending on new technological developments and innovation.</p>	The plan should help to support the aims of this Strategy through requiring high levels of protection for the water environment.	The SA Framework should contain objectives related to water resources, flooding and climate change.
Flood and Water Management Act (2010)			
<p>The Act will provide better, more comprehensive management of coastal erosion and flood risk for people, homes and businesses. It also contains financial provisions related to the water industry.</p> <p>The Act will give the EA an overview of all flood and coastal erosion risk management and unitary and county councils the lead in managing the risk of local floods. It will also enable better management of water resources and quality, and will help to manage and respond to severe weather events such as flood and drought.</p>	There are no specific targets or indicators of relevance.	The plan should consider flood risk issues. It should seek to avoid siting new development in floodplain and ensure the sustainable use of water resources.	The SA Framework should include objectives, targets and indicators that address flooding risk and the need to manage run-off effectively.

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Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management (2005)			
<p>This strategy has a 20 year time horizon and seeks to implement a more holistic strategy to flood and coastal erosion risks.</p> <p>The aim is to manage risks by employing an integrated portfolio of approaches which reflect both national and local priorities to reduce the threat to people and their property and to deliver the greatest environmental, social and economic benefits</p> <p>A whole catchment and whole shoreline approach will be adopted and adaptation to climate change will be an inherent part of flood and coastal erosion decisions.</p>	There are no specific targets or indicators of relevance.	The plan needs to ensure that development in floodplains is discouraged.	The SA Framework should include objectives, targets and indicators that address flooding risk and the need to manage runoff effectively.
Waste Management Plan for England (2013)			
<p>The Waste Management Plan for England is a high level document which is non-site specific. It provides an analysis of the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised WFD. National planning policy on waste is currently set out in Planning Policy Statement 10 'Planning for Sustainable Waste Management. It provides the planning framework to enable local authorities to put forward, through local waste management plans, strategies that identify sites and areas suitable for new or enhanced facilities to meet the waste management needs of their areas. This policy is currently being updated and has been subject to public consultation. Once it has been finalised, the updated policy will replace Planning Policy Statement 10 as the national planning policy for sustainable waste management.</p>	<p>Measures to be taken to ensure that by 2020</p> <ol style="list-style-type: none"> at least 50% by weight of waste from households is prepared for re-use or recycled. at least 70% by weight of construction and demolition waste is subjected to material recovery. 	The plan should seek to ensure sustainable waste management.	The SA Framework should include objectives, indicators and targets that address sustainable waste management issues.
The Egan Review – Skills for Sustainable Communities (2004)			

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<p><i>“Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice. They achieve this in ways that make effective use of natural resources, enhance the environment, promote social cohesion and inclusion and strengthen economic prosperity.”</i></p> <p>The key components of sustainable communities are:</p> <ul style="list-style-type: none"> ▪ Governance – effective and inclusive participation, representation and leadership. ▪ Transport and connectivity – Good transport services and communications linking people to jobs, schools, health and other services. ▪ Services – a full range of appropriate, accessible public, private community and voluntary services. ▪ Environmental – providing places for people to live in an environmentally friendly way. ▪ Economy – A flourishing and diverse local economy. ▪ Housing and the Built Environment – a quality built and natural environment <p>Social and cultural – vibrant, harmonious and inclusive communities.</p>	<p>A series of indicators are defined for each of the key components to monitor progress. These include:</p> <ul style="list-style-type: none"> ▪ % of population who live in wards that rank within the most deprived 10% and 25% of wards in the country. ▪ % of residents surveyed and satisfied with their neighbourhoods as a place to live. ▪ % of respondents surveyed who feel they ‘belong’ to the neighbourhood (or community). ▪ Domestic burglaries per 1000 households and % detected. ▪ % of adults surveyed who feel they can influence decisions affecting their local area. ▪ Household energy use (gas and electricity) per household. ▪ % people satisfied with waste recycling facilities. ▪ Average no. of days where air pollution is moderate or higher for NO₂, SO₂, O₃, CO or PM₁₀. ▪ No. of unfit homes per 1,000 dwellings. ▪ % of listed building of Grade I and II* at risk of decay. ▪ % of residents surveyed finding it easy to access key local services. ▪ % of people of working age in employment (with BME breakdown). ▪ Average life expectancy. <p>No. of primary care professionals per 100,000 population.</p>	<p>The plan should include policies that support the principles of the Egan Review and seek to develop sustainable communities.</p>	<p>There are a number of objectives and indicators in the document that should be integrated into the SA Framework.</p>

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Working for a Healthier Tomorrow – Dame Carol Black’s Review of the health of Britain’s working age population (2008)			
<p>This Review sets out the first ever baseline for the health of Britain’s working age population, seeking to lay the foundations for urgent and comprehensive reform through a new vision for health and work in Britain. Three principles lie at the heart of this vision:</p> <ul style="list-style-type: none"> Prevention of illness and promotion of health and well-being Early intervention for those who develop a health condition An improvement in the health of those out of work so that everyone with the potential to work has the support they need to do so <p>The Review recognises the human, social and economic costs of impaired health and well-being in relation to working life in Britain. The aim of the Review is not to offer a utopian solution for improved health in working life, but more to identify the factors that stand in the way of good health and to elicit interventions (including services, changes in attitudes, behaviours and practices) that can help to overcome them.</p> <p>Monitoring the baseline presented in this Review will be critical, together with a research programme to inform future action with a comprehensive evidence base and increased cross-governmental effort to ensure progress.</p>	<p>Although there are no relevant targets within the Review, it presents a number of indicators of working age health, which include:</p> <ul style="list-style-type: none"> Life expectancy Mortality during working age % of the working age population being in good, fairly good or poor health Proportion of people out of work due to sickness or disability Sickness absence per annum Sickness notes issued per medical condition % of working time lost due to sickness Proportion of the working age population on incapacity benefits Employment rate Employment rate for disabled people Income rates Economic inactivity and reasons for inactivity, split into those inactive who would like to work and those seeking work Proportion of deviation from perfect health by social class (Quality Adjusted Life Year (QALY) health measure) and work status Proportion of adult population who smoke Work related illness by industry Proportion of working age population with mental health conditions Incapacity benefits claimants by primary medical condition <p>Costs of working age ill health</p>	<p>The plan should consider issues relating to human health.</p>	<p>The SA Framework should include objectives that seek to protect human health and reduce health inequalities.</p>
Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002			

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>The 2001/2 Report and its update seek to provide quantitative estimates of the possible impacts of climate change on health. It is recognised that there could be significant long-term health effects as a result of climate change.</p> <p>Since the original report, the assessment of future climate change has been updated. A new generation of high-resolution climate models has allowed for improved estimates of future changes in the frequency, intensity and duration of extreme events in the UK. Some of the major areas of concern are:</p> <ul style="list-style-type: none"> ▪ Flooding ▪ Vector-borne diseases ▪ Food-borne diseases ▪ The effects of climate change on drinking water supplies ▪ The direct effects of high temperatures ▪ The air pollution climate <p>Exposure to ultra-violet light</p>	<p>A number of indicators are presented in this Report. The key ones include:</p> <ul style="list-style-type: none"> ▪ Mean annual temperature ▪ Number of days per year with daily mean exceeding 20°C ▪ Number of days per year with daily mean below 0°C ▪ Annual total rainfall ▪ Seasonal rainfall ▪ Maximum daily wind speed ▪ Annual highest maximum daily wind speed <p>Annual cases of malaria</p>	<p>The plan should address the issues relating to climate change, and the need to encourage provision of high quality and flexible health services.</p>	<p>The SA Framework should include objectives that address climate change issues including flooding and the need to reduce greenhouse gas emissions. It should also include an objective related to human health.</p>
Local Air Quality Management – Consultation on options to improve air quality management in England (July 2013)			
<p>The consultation document was prepared by Defra and it aims to improve local air quality management. It recognises that local authorities have an important part to play in helping to improve air quality and in working towards EU standards. This includes coordinating local assessment and action; taking air quality into account when undertaking transport functions, ensuring the planning system is deployed to limit deterioration of air quality (or exposure) and where possible to improve air quality and promote the public health benefits of good air quality.</p>	<p>Local Air Quality Objectives are presented in Annex 1 of this consultation document:</p> <ul style="list-style-type: none"> ▪ Nitrogen Dioxide (NO₂) - 200 µg/m³ (not to be exceeded more than 18 times a year – 1 hour mean) ▪ Particles (PM₁₀) – 50 µg/m³ not to be exceeded more than 35 times a year – 24 hour mean ▪ Sulphur Dioxide – 350 µg/m³ not to be exceeded more than 24 times a year – 1 hour mean 	<p>The plan should address the issues relating to air quality, and the need to encourage sustainable travel modes, e.g. walking, cycling, public transport.</p>	<p>The SA Framework should include objectives that address air quality issues. It should also include an objective related to human health.</p>
Tackling Health Inequalities – A Programme for Action 2003 (Including the 2007 Status Report on the Programme for Action)			
<p>This Programme for Action was prepared by the Department of Health, setting out plans for the following three years to tackle health inequalities that are found across different geographical areas, between genders and different ethnic communities and also between different social and economic groups. It established the foundations required to achieve the</p>	<p>The Programme for Action presents a number of national headline indicators that can be attributed to health inequality, including the following:</p> <ul style="list-style-type: none"> ▪ Number of primary care professionals per 100,000 population 	<p>The plan should consider issues relating to human health.</p>	<p>The SA Framework should include objectives that seek to protect human health and</p>

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>challenging national target to reduce the gap in infant mortality across social groups, and raise life expectancy in the most disadvantaged areas faster than elsewhere, by 2010.</p> <p>The programme was organised around four themes:</p> <ul style="list-style-type: none"> Supporting families, mothers and children – to ensure the best possible start in life and break the inter-generational cycle of health Engaging communities and individuals – to ensure relevance, responsiveness and sustainability Preventing illness and providing effective treatment and care – making certain that the NHS provides leadership and makes the contribution to reducing inequalities that is expected of it Addressing the underlying determinants of health – dealing with the long-term underlying causes of health inequalities <p>These themes are underpinned by discrete principles to guide how health inequalities are tackled in practice.</p> <p>The programme sets out an ambitious agenda including targets and milestones, in order to help to reduce inequalities by progressing against the 2010 national target and also tackling the underlying causes in the future.</p>	<ul style="list-style-type: none"> Road accident casualties in disadvantaged communities Proportion of children living in low-income households Proportion of those aged 16 who get qualifications equivalent to 5 GCSEs at grades A* to C Proportion of households living in non-decent housing Prevalence of smoking among people in manual social groups, and among pregnant women <p>Age-standardised death rates per 100,000 population for the major killer diseases (cancer, circulatory diseases), ages under 75 (for the 20% of areas with the highest rates compared to the national average)</p>		<p>reduce health inequalities.</p>
Water for People and the Environment: A Strategy for England and Wales (2009)			

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>This strategy sets out how the Environment Agency believe water resources should be managed throughout England and Wales to 2050 and beyond to ensure that there will be enough water for people and the environment.</p>	<p>This Strategy includes many targets from other plans and policies including:</p> <p>The Housing Green Paper, 13 published in July 2007, set new long term housing targets for England – to provide two million homes by 2016 and three million homes by 2020.</p> <ul style="list-style-type: none"> ▪ The food industry has committed to reduce water consumption by 20 per cent by 2020. ▪ The Carbon Reduction Commitment aims to reduce carbon dioxide emissions by four million tonnes per year by 2020, helping achieve reduction targets outlined in the Climate Change Act. ▪ The UK has a green energy target of 15 per cent by 2020. ▪ The Government in England has set a target for its own departments to achieve a 30 per cent reduction in their carbon emissions by 2020. The Environment Agency has set themselves a target to achieve this reduction by 2012. <p>The England and Wales annual target of saving water is 23 MI/d.</p>	<p>The plan should consider how the water environment can be protected and enhanced, and include policies that promote the sustainable use of water resources.</p>	<p>The SA Framework should include objectives that consider effects upon water quality and resource.</p>

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
National Planning Policy Framework March 2012			
<p>The National Planning Policy Framework sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.</p> <p>The Government aims to achieve sustainable development through:</p> <ul style="list-style-type: none"> ▪ 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 	There are no specific targets or indicators of relevance.	The plan should adhere to the principles of the Planning Policy Framework ensuring that all aspects of the core land-use planning principles underpin the Local Plan.	The SA Framework should include objectives relating to economic, environmental and social issues.
Planning Update Ministerial Statement (March 2015)			
<p>The statement outlines steps the government are taking to streamline the planning system, protect the environment, support economic growth and assist locally-led decision-making. It addresses the following topics:</p> <ul style="list-style-type: none"> ▪ Solar energy: protecting the local and global environment ▪ Green belt: protecting against inappropriate development ▪ Unauthorised encampments: ensuring fair play in the planning system ▪ Parking: helping local shops and preventing congestion ▪ Planning applications: streamlining the process ▪ Short term lets: championing the shared economy ▪ Planning guidance: making the planning system more accessible ▪ Change of use: supporting brownfield regeneration ▪ Zero Carbon Homes: supporting small builders ▪ Housing standards: streamlining the system 	There are no specific targets or indicators of relevance.	The plan objectives and policies need to be broadly compatible with the steps outlined within the statement.	The SA Framework should take the statement into consideration.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<ul style="list-style-type: none"> Plan making Decision taking, transition and compliance 			
Planning Policy for Travellers Sites (DCLG, 2015)			
<p>This document sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.</p> <p>To help achieve this, Government's aims in respect of traveller sites are:</p> <ol style="list-style-type: none"> That local planning authorities should make their own assessment of need for the purposes of planning to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites to encourage local planning authorities to plan for sites over a reasonable timescale that plan-making and decision-taking should protect Green Belt from inappropriate development to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply to reduce tensions between settled and traveller communities in plan-making and planning decisions to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure for local planning authorities to have due regard to the protection of local amenity and local environment 	There are no specific targets or indicators of relevance.	The plan should include provisions for Travellers Sites.	The SA Framework should be mindful of the aims outlined within the policy.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
Starter Homes Written Statement (March 2015)			
The written statement outlines changes to planning policy announced following response to the consultation on proposals to enable more starter homes for first time buyers.	No relevant targets and indicators	The plan should make reference to Starter Homes.	The SA Framework should include reference to the provision of housing that meet all community needs.
Fixing the Foundations: Creating a More Prosperous Nation (July 2015)			
The document outlines the ambition for Britain to become the richest of all major economies by 2030 and the conservative government's vision for delivering this vision.	There are no specific targets or indicators of relevance within this document.	The plan should be mindful of the vision outlined within this document and should include policies that seek to enable the development of the economy.	The SA Framework should be mindful of this document and its vision.
Localism Act 2011			
<p>The Localism Act contains a number of proposals to give local authorities new freedoms and flexibility shifting power from the central state. In summary the Act gives:</p> <ul style="list-style-type: none"> ▪ New freedoms and flexibilities for local government; <ul style="list-style-type: none"> - Gives local authorities everywhere the formal legal ability and greater confidence to get on with the job of responding to what local people want - Cuts red tape to enable councillors everywhere to play a full and active part in local life without fear of legal challenge - Encourages a new generation of powerful leaders with the potential to raise the profile of English cities, strengthen local democracy and boost economic growth - Enables ministers to transfer functions to public authorities in cities in order to harness their potential to drive growth and prosperity ▪ New rights and powers for local communities <ul style="list-style-type: none"> - Makes it easier for local people to take over the amenities they love and keep them part of local life - Ensures that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done 	There are no specific targets or indicators of relevance.	The plan should be mindful of the key principles of this Act.	The SA Framework should be mindful of this Act as its principles will help to create vibrant, cohesive and empowered communities.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<ul style="list-style-type: none"> - Enables local residents to call local authorities to account for the careful management of taxpayers' money ▪ Reform to make the planning system clearer, more democratic and more effective <ul style="list-style-type: none"> - Places significantly more influence in the hands of local people over issues that make a big difference to their lives - Provides appropriate support and recognition to communities who welcome new development - Reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future - Reinforces the democratic nature of the planning system - passing power from bodies not directly answerable to the public, to democratically accountable ministers ▪ Reform to ensure that decisions about housing are taken locally <ul style="list-style-type: none"> - Enables local authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective - Gives local authorities more control over the funding of social housing, helping them to plan for the long term - Gives people who live in social housing new ways of holding their landlords to account, and make it easier for them to move 			
National Planning Policy for Waste (2014)			
<p>The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Positive planning plays a pivotal role in delivering this country's waste ambitions through:</p> <ul style="list-style-type: none"> ▪ delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy (see Appendix A) ▪ ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities; 	There are no specific targets or indicators of relevance within this document.	The plan should seek to ensure a more sustainable and efficient approach to resource use and management and should contribute to achieving waste ambitions.	The SA Framework should include objectives and targets that address waste and sustainable resource use.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<ul style="list-style-type: none"> providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle; helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste. 			
Building for Life 12 (2012)			
<p>This document provides the standard for well-designed homes and neighborhoods which local communities, local authorities and developers can utilise to stimulate conversations about creating good places to live. The document comprises 12 questions split over three categories to establish the quality of the project.</p>	<p>Although not strict targets, the aim is for buildings to gain as many 'green lights' to 12 questions in three key areas:</p> <ul style="list-style-type: none"> Integrating into the neighbourhood Creating a place Street and home 	<p>The plan should be mindful of recommendation in the document how to improve homes, neighbourhoods and communities.</p>	<p>The SA should include objectives around generating buildings, neighbourhoods and communities which flourish</p>
Europe 2020: UK National Reform Programme 2013 (April 2013)			
<p>The Programme sets out actions that the government is taking to address the structural reform challenges facing the UK, in line with a set of Country Specific Recommendations agreed by Heads of State or government at the European Council in June 2012. The NRP summarises relevant new announcements and reports on the impact of policies already implemented. It documents reports on progress in broad policy areas covered by five headline EU-level targets under the Europe 2020 Strategy, relating to employment, education, poverty reduction, research and innovation, and energy and climate change.</p>	<p>The document provides a progress update and puts forward overarching aims for the UK going forward around five key areas:</p> <ul style="list-style-type: none"> Employment Education Poverty reduction Research and innovation Climate Change 	<p>The plan should be aware of the key strategies put forward by this document and endeavour to incorporate those relevant within it.</p>	<p>The SA should include objectives around improvement in the five key areas outlined in this document.</p>

Summary of Regional, County and Local Plans and Programmes

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

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	Transport's share of region's CO2 emissions Freight transport: tonne/miles and empty lorry miles Air quality improvements measured against related illnesses Tourism by mode of transport 5) Proportion of housing unfit or lacking appropriate insulation, by area Availability of public services - transport, shops, banks etc by area 6) Household water use and peak demand Low flows in rivers Margin between water supply and projected demand % of water lost to leakage Area under agri-environment schemes Area converted to organic production Concentration of organic matter in agricultural top-soils Volumes of minerals produced in the region Level of minerals and aggregate use replaced by recycled or substitute materials Number of exhausted mineral sites returned to suitable use Construction and demolition waste going to landfill Imported mineral tonnage Numbers of dwellings created by re-use of existing buildings Number of buildings designed to sustainability principles 7) Levels of wastes and emissions (nutrients, pesticides, herbicides) Household waste and recycling Rivers of good or fair quality Proportion of water needs met by local water recycling in urban and rural areas Compliance with Bathing Water Directive Concentrations of persistent organic pollutants		

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<p>Air quality - number of days per year any parameter exceeds its National Standard</p> <p>8) Percentage of food, timber, and raw materials used in the region which is imported from unsustainable sources</p> <p>Percentage of food consumed in the region that is produced locally</p> <p>Number of farmers markets, and local trading schemes</p> <p>9) Vacant land and properties and derelict land</p> <p>Proportion of new retail in town centres versus out-of-town</p> <p>Proportion of population living in town centres</p> <p>Access to local green space</p> <p>Quality of surroundings</p> <p>Noise levels</p> <p>Rates of fear of crime</p> <p>% households stating their neighbourhood has 'community spirit'</p>		
East of England Forecasting Model 2014			
The East of England Forecasting Model (EEFM) was developed by Oxford Economics to project economic, demographic and housing trends in a consistent fashion and in a way that would help in the development of both the Regional Economic Strategy and the Regional Spatial Strategy for the East of England. The Model is based in Excel spreadsheets, allowing users to produce scenarios under which the impacts of a given scenario can be monitored.	The 2014 report provides a comparison against 2013 estimates.	The model outcomes for the East of England which should be taken into account when developing housing targets.	The SA needs to include objectives that relate to economic growth and appropriate housing provision to meet the needs of an expanding population.
Transforming Suffolk's Community Strategy 2008-2028 (2008 revision)			
Aim is to improve quality of life in Suffolk for its people and communities.	To become the most innovative and diverse economy in the East of England:	A number of the key ambitions outlined in the	The SA Framework should integrate the four

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Document focuses on the future looking forward to the next 20 years and is based around four themes.</p> <p>A Prosperous and Vibrant Economy:</p> <p>Learning and skills for the future:</p> <p>Creating the Greenest County</p> <p>Safe, Healthy, Inclusive Communities</p>	<p>Transport and infrastructure to support sustainable growth</p> <p>Learning and skills levels in the top quartile in the country</p> <p>County with greatest reduction in carbon emissions;</p> <p>Reducing carbon footprint;</p> <p>Adapting to climate change and geography;</p> <p>Retain and maintain natural and historic environments</p> <p>Pursue healthy lifestyles, safety, and sense of community belonging</p>	<p>document need to be considered when developing the plan.</p>	<p>core themes and principles.</p>
Transforming Suffolk Community Strategy: Suffolk Strategic Partnership (2008)			
<p>Purpose of Suffolk LLA is to improve performance in an area. There is a close similarity between the outcomes in Suffolk Strategic Partnership's community strategy and those agreed for Ipswich:</p> <p>Local Strategic Partnerships for Ipswich:</p> <p>Everyone should have a roof over their head</p> <p>Everyone should enjoy good health</p> <p>There should be work for all</p> <p>The creation of a better environment</p> <p>People should be kept safe</p> <p>People should live in friendly and supportive communities.</p>	<p>Ipswich Priorities:</p> <p>Working at neighbourhood level to tackle deprivation and address health, social and economic inequalities</p> <p>Community cohesion and integration of new communities</p> <p>Meeting the growing demand for affordable homes, social rented housing and a partnership approach to addressing deprivation, inequalities and environmental issues relating to housing</p> <p>Tackling drug related crime</p> <p>Environmental issues – making sure Ipswich grows in the right way</p> <p>Supporting business to grow and create more jobs.</p>	<p>The actions, indicators and targets of the LLA should be considered in the development of the plan.</p>	<p>The SA Framework should incorporate indicators and targets that seek to protect community interests.</p>
Suffolk Growth Strategy March 2013			
<p>The growth strategy provides a broad framework and vision on how to encourage business to be successful. It provides opportunities for growth in different sectors of the economy in Suffolk.as well as identifies a potential to create thousands of additional high value and highly skilled jobs in the county.</p> <p>The strategy aims to address the barriers to growth and sets out objectives associated with inward investment,</p>	<p>Increase the number of apprenticeship starts (at all ages) by at least 33% by 2015/16, from 6,272 currently to 8,342; and to increase the number of 16-18 year olds in apprenticeships by 50% from 1,613 currently to 2,477.</p> <p>The vision is for Superfast Broadband (both fixed andmobile), offering typical speeds of 100Mbps, to everyone (100% of homes and small business) in Suffolk by 2020. This investment will bring benefits</p>	<p>The plan should take into consideration the key development sites within the Suffolk Growth Strategy in Ipswich: Ransomes Europark Expansion, Ravenswood, Futura Park, Former Sugar Beet Factory, Adastral</p>	<p>The SA Framework should include objectives that promote economic growth and encourage inward investment.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
economic growth, improvement of skills and education and improvement of infrastructure.	including economic growth of up to 20% over 15 years, and the creation of up to 5,000 new full-time jobs.	Park Expansion. Along with strategic improvements of A12.	
Minerals and Waste Development Framework: Waste Core Strategy (Suffolk County Council, 2011)			
<p>Vision:</p> <p>Cease of landfilling of untreated municipal, commercial and industrial wastes by 2026</p> <p>Recovering value from waste that cannot practically be recycled or composted</p> <p>Waste management activities to be sensitively located and appropriately operated to high standards to reduce impact/harm on the environment, human health and local amenity and tranquility</p> <p>Former temporary waste management activities (i.e. landfill sites) will be restored to a quality and a state conducive to appropriate after uses such as agriculture and improving habitat biodiversity</p> <p>Aims (reflect national and regional waste policy together with local considerations):</p> <p>Manage volume of waste identified in the East of England plan as being apportioned to Suffolk</p> <p>To promote and encourage sustainable practices in the transportation and management of waste</p> <p>Contribute to social and economic well being</p> <p>To protect against adverse impacts on human wellbeing and to ensure waste management facilities do not endanger human health</p> <p>To protect and enhance the built, natural and historic environment</p>	<p>Relevant targets:</p> <p>Minimise waste as a priority and encourage communities to take responsibility for the waste they produce through better education through a public consultation</p> <p>Have efficient transportation of waste throughout Suffolk</p> <p>Increase access to Household Waste Recycling Centres</p> <p>Minimise adverse impacts on air quality</p> <p>Minimise adverse impacts on landscape quality and the built and historic environment</p>	<p>The plan should promote sustainable waste management and promote rates of recycling.</p>	<p>The SA Framework should encourage sustainable waste management.</p>

Regional, County and Local Plans									
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA						
To assist in reducing the impacts of climate change upon the environment									
Minerals Core Strategy (Suffolk County Council, 2008)									
The Minerals Core Strategy sets out the key elements of the minerals planning framework for the County based on an agreed vision followed by aims and strategic objectives. National planning policy statements contained within MPS1 and associated documents cannot be repeated within the Core Strategy but are, where appropriate, reflected in accompanying text. Specific policies have been tailored to reflect the Suffolk environment and the monitoring and implementation framework will provide a clear methodology for the delivery of the Core Strategy’s objectives.	No specific targets or indicators of relevance.	The plan should promote be mindful of this strategy.	The SA Framework should consider the policies outlined within this strategy.						
Joint Municipal Waste Management Strategy for Suffolk 2003 – 2020									
Enhance joint working between authorities to improve waste management services Involve public community groups, waste management industry and governmental bodies in all aspects of waste management Promotion of education programmes and awareness campaigns to increase knowledge of waste issues and participation in waste management initiatives Promote and encourage waste reduction and make representation seeking changes to national taxation regulation regimes in order to encourage waste reduction Promote and encourage waste re-use schemes: Supporting communities re-use schemes with advice and funding where resource allow Promote awareness of what people can do to re-use waste	<u>National Recycling and Recovery targets:</u> Household waste recycling and composting Recover 45% by 2015 Recover 50% by 2020 Municipal waste recovery: Recover 67% by 2015 Recover 75% by 2020 Landfill Allowance Trading Scheme (LATS) Landfill allowances: <table><tr><th>LATS</th><th>Landfill Allowance</th></tr><tr><td>2013</td><td>99,160</td></tr><tr><td>2020</td><td>69,385</td></tr></table> <u>Regional relevant targets:</u>	LATS	Landfill Allowance	2013	99,160	2020	69,385	The plan should recognise the need to implement sustainable waste removal that does not impact on human health or the environment. Any waste policy in the plan should be developed in accordance with the waste strategy with a clear commitment to the waste hierarchy.	The SA Framework should promote and encourage sustainable waste management particularly within new development.
LATS	Landfill Allowance								
2013	99,160								
2020	69,385								

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Encourage the re-use of waste collected through recycling centres</p> <p>Seek to maximise the proportion of waste that is recycled or composted, aiming to achieve at least 60% by 2015</p> <p>Introduce “three stream” collection system from the curb side of at least 80% of households in Suffolk by 2010</p> <p>Investigate the possibility of introducing the curb side collection of glass</p> <p>Promote home composting in all areas through promotional and educational campaigns</p> <p>Support community composting initiatives</p> <p>Increase the number of bring sites for the collection of glass throughout the county</p> <p>Optimise the number and location of household waste and recycling centres; increase the quantity and range of material recycled – aiming to recycling 55% of waste taken to sites by 2015</p> <p>Introduce non landfill facilities for the treatment of residual waste</p> <p>Minimise the amount of waste landfill by maximising reduction, re use, recycling and composting</p> <p>Reduce costs by securing joint procurement and tendering and maximising funding from external sources</p> <p>Work with Waste and Resource Action Programme, businesses and the community in order to develop markets for recycled waste and outlets.</p>	<p>Minimise the impacts of new developments, especially in the Key Centres of Development and Change, on regional waste management requirements</p> <p>Minimise the environmental impact of waste management arising from movement of waste, and help secure the recovery and disposal of waste without endangering human health</p> <p>Recognise particular locational needs of some types of waste management facilities in determining planning application and defining green belt boundaries</p> <p>Targets to minimise waste and provide the basis for implementing the overall aim of recycling, compositing, and recovering value from waste:</p> <p>Municipal waste – recovery of 70% by 2015</p> <p>Commercial and industrial waste – recovery of 75% by 2015; and eliminate landfilling of untreated municipal and commercial waste in the region by 2021</p> <p>Relevant Indicators:</p> <p>Kilograms of household waste collected per head (BVPI 84) – Waste Disposal Authority (WDA) and seven Waste Collection Authority (WCA) figures combined;</p> <p>Tonnage and percentage of household waste recycled and composted, including HWRC (BVPIs 82a and 82b);</p> <p>Percentage of householders that have a separate kerbside collection of dry recyclable and compostable waste;</p> <p>Number of home composters distributed via partnership scheme;</p> <p>Recycling rate at HWRCs;</p> <p>Tonnage of municipal waste landfilled</p>		
Suffolk's Climate Action Plan 2 (2012)			

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Develop a credible pathway to reduce carbon emission associated with energy use in Suffolk by 60% (on 2004 levels)</p> <p>Support the development of a green economy</p> <p>Adapt to future climate change and resource scarcity</p>	<p>Reduction of Suffolk's annual CO2 emission by 760kt by the end of the decade</p> <p>–</p> <p>Foster resilience to climate change (i.e. winter flooding and summer heat wave events) and promote water saving and energy efficiency</p>	<p>The plan must ensure it is resilient to the future effects of climate change.</p>	<p>The SA Framework should echo the vision and objectives of the plan. It should include objectives that reduce greenhouse gas emissions and adapt to climate change.</p>
Suffolk's Local Transport Plan 2011 – 2031 (Part 1 and Part 2)			
<p>Priorities:</p> <p>Creating a prosperous and vibrant economy</p> <p>Creating the greenest county</p> <p>Safe, healthy and inclusive communities (Protect vulnerable people and reduce inequalities)</p> <p>Learning and skills for the future (Transform learning and skills)</p>	<p>Transport aims to meet priorities:</p> <p>1)</p> <p>Improve connectivity and accessibility</p> <p>Maintain core transport networks. Balance capacity and demand for travel, through increasing the use of sustainable transport and reducing need for travel</p> <p>Improve access to jobs and commercial markets for residents and businesses based in the county</p> <p>2)</p> <p>Reduced emissions from transport, including road maintenance</p> <p>Maintaining resilience of transport networks (e.g. coping with flooding, pot holes, winter damage)</p> <p>Reduced air pollutant emissions</p> <p>3)</p> <p>Facilitating an increase in walking and cycling</p> <p>Improving the physical accessibility of the transport system, improving information about travel options, improving access to services for those without access to cars</p> <p>Supporting wider regeneration</p> <p>Reducing the number of casualties on the transport network</p>	<p>The plan should be aligned with Suffolk's Transport Plan. It should also seek to reduce the dependence on the private car through maximising opportunities for people to use sustainable modes of transport.</p>	<p>The SA Framework should include objectives that encourage and promote the use of sustainable transport along with providing new infrastructure where required.</p>

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<p>Reducing impact of poor air quality on local communities</p> <p>4)</p> <p>Improving accessibility to schools, colleges, universities and other places of learning</p> <p>Access to broadband for online learning</p>		
New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013			
<p>We have a simple Vision for New Anglia in 2025- more jobs, businesses and prosperity.</p> <p>In 2025, Greater Norwich and Greater Ipswich will be two of the most competitive City regions in Europe for domestic and foreign investment. Suffolk and Norfolk will have as international reputation for our home produced food, the quality of our festivals and cultural events and the beauty and diversity of our coasts and countryside.</p> <p>School attainment throughout New Anglia will match the best in Europe making it easy to attract skilled and talented professionals to drive our global companies.</p> <p>Superfast broadband and 6g mobile phone services will be available everywhere in New Anglia.</p>	<p>The UK economy will grow by 0.6% during the rest of 2013 and by 1.8% and 2.3% in the next two years.</p>	<p>The plan should seek to promote sustainable economic growth within Ipswich that meets the needs of its residents with regards to jobs and new homes.</p>	<p>The SA Framework should include objectives that support sustainable economic growth and the provision of jobs.</p>
New Anglia Strategic Economic Plan (New Anglia Local Enterprise Partnership)			
<p>Our Strategic Economic Plan (SEP) sets out our ambition to harness our distinct sector strengths and our natural assets to deliver more jobs, new businesses and housing.</p>	<p>Our plan commits us to work with government and local partners to deliver:</p> <ul style="list-style-type: none"> 95,000 more jobs: In 2012 there were some 760,000 jobs in the New Anglia area. The East of England Forecasting Model predicts that continuation of pre-existing investment plans will see this grow by 63,000 by 2026. Our Strategic Economic Plan will significantly increase this business as usual number by 50 per cent to 95,000 	<p>The plan should include policies that support economic growth through housing and employment delivery.</p>	<p>The SA Framework should include objectives that support economic growth.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<ul style="list-style-type: none"> 10,000 new businesses: Small businesses are the lifeblood of our economy – accounting for more than 95 per cent of businesses in the area. By 2026 we will create a further 10,000 businesses. This equates to an average increase of 1,000 per year compared with an average increase of 516 per year between 2004 and 2008 and an average decrease of 615 per year between 2009 and 2011 Improved productivity: Gross Value Added (GVA) per job in the area was £36,244, some 10% below the UK average of £40,007. The East of England Forecasting Model predicts that pre-existing investment plans will see this gap remain. Our Strategic Economic Plan will enable us to extinguish the gap by 2026 when gross added value per job will equal the national average 117,000 new houses: Our local authorities have set ambitious house building targets to support economic growth. By 2026 we will have delivered at least 117,000 new houses in the New Anglia area – key local plans have the flexibility to deliver more if the demand arises. This equates to a 32% increase in delivery compared with the period 2001-12 		
East of England Learning and Skills Council (LSC) Equality and Diversity Action Plan 2008			
<p>It lays out actions for the LSC East of England to meet its statutory duties as laid out in the LSC Single Equality Scheme</p> <p>The action plan is broken into four areas:</p> <p>Learning and skills</p> <p>Performance of the system</p> <p>Impact measures and impact assessment</p> <p>Governance</p>	<p>Raise the quality and improve the choice of learning opportunities</p> <p>Raise the skills of the region, giving employers and individuals the skills they need to improve productivity</p> <p>Raise their contribution to economic development</p> <p>Raise the performance of a world class system that is responsive, provides choice and is valued and recognised for its excellence</p> <p>To provide measures that will enable overall progress to be judged</p>	<p>The plan should seek to reduce discrimination and promote equality and diversity within Ipswich.</p>	<p>The SA Framework should include objectives that reduce discrimination and promote equality within Ipswich.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	Make promoting equality and diversity an integral part of how the East of England LSC is led and governed		
Suffolk Haven Gateway Employment Land Review 2009			
The Employment Land Review and Strategic Sites Study for Suffolk Haven Gateway looks into providing the right mix of employment land to meet the future job growth target of 30,000 in the Suffolk Haven Gateway sub-region. There are evident opportunities through investment in infrastructure and allocation of employment land in the right locations (the A14 and the Ipswich Fringe) to provide a quality and choice that will support efforts to retain existing businesses and encourage new ones and thereby work to achieve the employment target.	No specific indicators or targets of relevance in this plan or programme.	The plan should reference this document when selecting new employment sites.	The SA Framework should include objectives that support economic growth.
East of England Plan for Sport (2004)			
The aim is to change the culture of sport and physical activity in England in order to increase participation across all social groups leading to improvements in health and in other social and economic benefits; and providing the basis for progression into higher levels of performance.	Key targets: Increasing participation in sport and active recreation Improving levels of performance Widening access Improving health and well being Creating stronger and safer communities Improving education Benefiting the economy	The plan policies should seek to increase participation in sport. This could include opportunities to improve access to existing facilities, to prevent the loss of existing facilities and to support the provision of new facilities.	The SA Framework should consider objectives to increase participation in sport through improved access and additional facilities. Suitable objectives should also be developed in relation to protecting human health.
Biodiversity Action Plan for Suffolk (Various dates)			
The plan comprises a series of action plans for habitats and species in Suffolk. For each of the habitats and species information is provided about current national, regional and local status.	For each habitat type/species a series of objectives, actions and timescales for implementation are identified.	The plan should incorporate policies that support and promote the	The SA Framework should seek to maximise benefits to biodiversity resources.

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
		enhancement of biodiversity.	
Anglian River Basin Management Plan (2014)			
<p>This plan has been prepared under the Water Framework Directive, which requires all countries throughout the European Union to manage the water environment to consistent standards. Each country has to:</p> <p>Prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters;</p> <p>Aim to achieve at least good status for all water bodies by 2015. Where this is not possible and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027;</p> <p>Meet the requirements of Water Framework Directive Protected Areas;</p> <p>Promote sustainable use of water as a natural resource;</p> <p>Conserve habitats and species that depend directly on water;</p> <p>Progressively reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment;</p> <p>Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants;</p> <p>Contribute to mitigating the effects of floods and droughts.</p>	<p>By 2015, 16 per cent of surface waters (rivers, lakes, estuaries and coastal waters) in this river basin district are going to improve for at least one biological, chemical or physical element, measured as part of an assessment of good status according to the Water Framework Directive. This includes an improvement of 1,700 km of the river network in relation to fish, phosphate, specific pollutants and other elements.</p> <p>By 2015 19 per cent of surface waters will be at good ecological status/potential and 45 per cent of groundwater bodies will be at good status. In combination 20 per cent of all water bodies will be at good status by 2015. The Environment Agency wants to go further and achieve an additional two per cent improvement to surface waters across England and Wales by 2015.</p> <p>The biological parts of how the water environment is assessed – the plant and animal communities – are key indicators. At least 30 per cent of assessed surface waters will be at good or better biological status by 2015.</p>	The plan should seek to protect and enhance the water environment.	The SA Framework should include objectives that seek to protect and enhance water quality and water resources.
In Step with Suffolk: Right of Way Improvement Plan (2006-16)			
<p>Objectives:</p> <p>Provide a better signed, maintained and accessible network</p>	No relevant indicators	The plan should be consistent with the objectives of the Rights of Way Improvement Plan.	Baseline information, issues and opportunities identified within the plan should be considered

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<p>Provide and protect a more continuous network that provides for the requirements of all users</p> <p>Develop a safer network</p> <p>Increase community involvement in improving and managing the network</p> <p>Provide an up to date publically available digitised definitive map for the whole of Suffolk</p> <p>Improve promotion, understanding and use of network</p>			when developing the SA Framework.
Suffolk Walking Strategy (Suffolk County Council, 2015)			
<p>Aims of the Strategy:</p> <ul style="list-style-type: none"> - Walking is seen as beneficial, easy, inclusive, accessible, pleasant and safe - Walking is the 'default' choice for journeys of 20 minutes walking time or less <p>More people walking more often will improve the physical and mental health of the people of Suffolk and make a significant contribution towards Suffolk's ambition of being the most active county in England.</p> <p>Strategy Actions:</p> <ul style="list-style-type: none"> ▪ To increase daily physical activity ▪ To promote walking to all ▪ To address inequalities, particularly encouraging those who are active to become active, ensuring that we give additional support to those who need it most ▪ To create a strategic context that will support all organisations across Suffolk to apply for 	<p>The strategy outlines ways in which actions will be achieved including:</p> <p>To increase daily physical activity</p> <ul style="list-style-type: none"> ▪ Explore and consider opportunities and implement actions that make walking easier ▪ Improve information about walking options and walking routes ▪ Encourage organisational buy in to policies on improving infrastructure that supports walking ▪ Encourage all schools to actively monitor, review and develop high quality school travel plans ▪ Develop incentives with partners to encourage walking to work ▪ Influence educational settings and work places about the value of walking <p>To promote walking to all</p> <ul style="list-style-type: none"> ▪ Raise awareness with and encourage GPs and health professionals to engage with the strategy ▪ Establish a virtual resource to promote walking ▪ Support and promote the Suffolk Walking Festival as an annual celebration of walking in Suffolk 	<p>The plan should consider the actions within this plan and should seek to promote walking.</p>	<p>The SA Framework should include objectives and indicators which relate to increasing walking and physical activity.</p>

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>funding for the development of walking opportunities and infrastructure</p>	<ul style="list-style-type: none"> Explore innovative technology based initiatives that have the potential to increase walking Secure a media partner for walking promotion in Suffolk and develop a communications strategy <p>To address inequalities, particularly encouraging those who are active to become active, ensuring that we give additional support to those who need it most</p> <ul style="list-style-type: none"> Target and work with specific groups that we know are less likely to be physically active to encourage walking Continually highlight the accessibility of Suffolk, promoting the various benefits of walking on individuals and communities. Develop focus groups to ensure that we are meeting the needs to those who require additional support to walk more Work with representative bodies and existing event organisers to promote walking to specific groups who are less likely to be physically active <p>To create a strategic context that will support all organisations across Suffolk to apply for funding for the development of walking opportunities and infrastructure</p> <ul style="list-style-type: none"> Ensure a senior member of the Public Health team is responsible for promoting and developing walking Ensure the joint strategic needs assessment, the joint health and wellbeing strategy and other local needs assessments and strategies take into account opportunities to increase walking Provide the evidence and strategic justification to enable organisations across Suffolk to make the case to funding agencies and grant giving bodies for investment in walking in the county 		

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Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<ul style="list-style-type: none"> Host an annual walking stakeholder event to showcase good practice and promote collaboration in growing and sustaining walking participation in Suffolk 		
Leading the Way – Green Economy Pathfinder Manifesto 2012-15, New Anglia LEP			
Looking at the potential for sustainable growth in the development of low-carbon and environmental goods and services; the potential for employment and skills development; innovative financing for businesses and entrepreneurs; business resource efficiency; energy; how best to value the areas natural resources; and community benefits to be enjoyed from a thriving green economy in the Anglia region.	<p>Key targets:</p> <p>To grow sustainably and for the long term</p> <p>To use natural resources efficiently</p> <p>To be more resilient</p> <p>To build on current experience and exploit comparative advantages – to deliver innovative low-carbon solutions at scale.</p>	The plan should include methods to promote sustainable growth, develop a low carbon economy and increase efficiency.	The SA Framework should include objectives that promote sustainable growth, seek to develop a low carbon economy and increase efficiency.
Wild Anglia Manifesto ,September 2013, Part 1 Aims and Objectives			
<p>Wild Anglia's ambition to get sustainable development right in Norfolk and Suffolk. It focusses on the future of businesses, a better quality of life for a healthier population and a better place for our wildlife to thrive.</p> <p>Key objectives:</p> <p>Economic growth: nature will make a full contribution to the success of the economy.</p> <p>Exemplary 'green infrastructure': insisting on the best projects for people, nature and economy.</p> <p>Strengthening nature: creating, improving and investing in the natural environment</p> <p>Healthy, happy society: making the most of nature's capacity to improve lives.</p>	No specific targets and indicators	The plan should promote green infrastructure.	The SA Framework should include objectives to promote and developing green infrastructure in Ipswich.

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Suffolk's Nature Strategy (Wild Anglia, 2014)			
A 2020 vision for Suffolk's natural environment working together as individuals, communities, businesses and decision-makers, we will ensure Suffolk's natural environment is conserved and enhanced for future generations and continues to be seen as one of the county's key strengths. Its intrinsic value, as well as its importance to our economic growth, is increasingly understood, whilst the people of Suffolk and our visitors are able to gain better access to enhanced enjoyment and a deeper understanding of its unique qualities. We will continue to add to our knowledge of Suffolk's wildlife and landscapes and to collect high-quality information.	Suffolk's Nature Strategy describes the challenges and opportunities our natural environment faces. Its purpose is to articulate what we believe are the key natural environment priorities for the county and to convey to decision-makers how the wildlife and landscapes of Suffolk are important building blocks for our own economic growth and health and wellbeing. The recommendations and actions we propose within this document are both forward-looking and challenging. Their delivery will enhance the environment of Suffolk itself, as well as our ability to derive both economic and social benefits from it. Once you have read this document we hope that your understanding of the importance of the natural environment goes far beyond its beauty. It is aimed particularly at the leaders of public, private and voluntary sector organisations, but we hope it will also be of interest to anyone who cares about Suffolk's natural environment and the role it plays in our prosperity and wellbeing. The messages are equally relevant to businesses, health professionals and community representatives. Whilst conservation of Suffolk's environment	The plan should seek to protect and enhance the natural environment.	The SA Framework should include objectives that seek to protect and enhance nature and its resources.

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	<p>is of particular interest to us, everyone has a responsibility to look after it, and of course, many already do.</p> <p>The strategy is set out in three broad sections: natural environment, economic growth and health and wellbeing each containing a number of sub-sections for issues of particular importance to the delivery of our vision. Suffolk's Nature Strategy is written in the context of Wild Anglia's manifesto² (the Local Nature Partnership (LNP) across Norfolk & Suffolk). All the organisations involved in drafting this strategy are closely involved with the LNP and this strategy will contribute to Wild Anglia's vision across Norfolk & Suffolk.</p>		
Suffolk Cycling Strategy (Suffolk County Council, 2014)			
<p>With a growing population which will place increasing pressure on our road network, we have to consider how best to encourage people to take to their bikes. Clearly, we want to foster an environment where bike and car coexist, with an infrastructure that supports both and which encourages cycling, particularly for those two-thirds of car journeys which are fewer than five kilometres. We also know that many drivers would cycle more if the quality and provision was improved. So, the challenge is to promote the benefits of cycling as widely as possible, whilst at the same time we take on the more practical task of improving our cycling infrastructure. From local projects in our towns and villages, to better signage and a host of activities in between, we can succeed in encouraging more people in Suffolk to cycle than ever before if we work together. There are numerous thriving cycling groups and communities in Suffolk, from young people cycling to school to people</p>	<ul style="list-style-type: none"> • To encourage cycling across all sectors of the community, supporting • Suffolk's 'Most Active County' ambitions • To promote a transfer to cycling (and walking) for short distance trips, • supporting Suffolk's 'Creating the Greenest County' ambitions To promote the benefits of cycling for health and for the subsequent • savings in the health budget • To foster enthusiasm for cycling in young people • To plan and design for the future with cycling in mind • To create a safe and cycle friendly environment 	<p>The plan should seek to help and support cycle networks.</p>	<p>The SA Framework should include objectives that seek to help and support cycle networks.</p>

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commuting to work. We have a great foundation upon which to build.			
Anglian Water's Water Resources Management Plan 2015			
<p>This is our 2015 Water Resource Management Plan (WRMP). It shows how we are going to maintain the balance between supply and demand over the next 25 years, as well as deal with the longer term challenge of population increase, climate change and growing environmental needs. We supply water to approximately 2 million households in East Anglia, the adjacent areas of the South East, Midlands, Yorkshire, Humberside and to households in Hartlepool. Rainfall in most of our supply area is significantly less than the national average. We are classed as an area of severe water stress and have many wetland and conservation sites of national and international importance. Safeguarding these vital assets and maintaining supplies to customers are the two objectives of this plan. Over the next 25 years, our supply-demand balance is at risk from growth, climate change and the reductions in deployable output that we will make to restore abstraction to sustainable levels. In the worst case combination, the impact could approach 567Ml/d, equivalent to approximately 50% of the water we put into supply in 2012/13. We also have to manage risks from drought, deteriorating raw water quality and the impact of cold, dry weather on our distribution system and customer supply pipes.</p>	<p>The key elements of our final plan are:</p> <ul style="list-style-type: none"> • Supporting water efficiency, so that customers only use the water they need • Reducing the number of leaks from the network of pipes that transports water • Transferring water from where there is a surplus to areas of shortage • In the long-term, developing additional supplies. 	<p>The plan should seek to help and provide sustainability measures for water resources.</p>	<p>The SA Framework should include objectives that seek to help and support sustainable use of water resources.</p>
Ipswich Borough Council Level 2 Strategic Flood Risk Assessment (2011)			
<p>This Level 2 SFRA supersedes the draft level 1 SFRA dated November 2007 and accounts for the presence of recently improved flood defences within Ipswich, as well as</p>	<p>No specific targets identified.</p>	<p>The plan should seek to avoid development within Flood Zone 3.</p>	<p>The SA Framework should include objectives</p>

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<p>for the planned flood defence barrier expected to be operational in 2014.</p> <p>The SFRA also considers the potential effects of development on local flooding and minor watercourses and identifies mitigation measures including sustainable urban drainage systems (SUDS) and suggests a framework for safe development in flood zones 2 & 3.</p>			that address flood risk within Ipswich.
The Ipswich Drainage and flood defence policy (2002 with minor updates in 2009)			
<p>Sets out the Council's policy relating to flood protection and drainage</p> <p>Objectives:</p> <p>Control of development in areas at risk of flooding</p> <p>The Inspection and maintenance of ordinary watercourses</p> <p>Establishing flood warnings and emergency evacuation</p> <p>Creating sustainable urban drainage systems (SuDS)</p> <p>Includes: gardens, roads, pipework and manholes, private roofs, driveways and car parks; construction infiltration systems</p>	No specific targets and indicators	<p>Drainage and flood defence must be a key consideration during the preparation of the plan.</p> <p>The plan should seek to avoid development within Flood Zone 3.</p>	<p>The SA Framework should include policies that seek to preserve water resources, protect water quality and reduce flood risk i.e. through ensuring new development provides SuDs measures.</p>
Integrated Landscape Character Objectives (2010)			
<p>The aim was to develop a regional urban landscape typology for the East of England. It articulates the broad variety of towns and cities in the region and the characteristics of the urban landscape of each settlement.</p>	Development must maintain a "sense of place" relevant to the area.	Landscape character should be considered when drafting the plan and siting new development.	The SA Framework should include an objective on protecting and enhancing landscape character and quality.

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Provides an overview of landscape character and settlements for informing future assessment such as green infrastructure strategies for extension to existing settlements and creation of new settlements.			
Countryside Character Volume 6: East of England (1998)			
<p>This document presents the results of Natural England's survey of the countryside character and landscape of the East of England.</p> <p>Many different elements combine to create the character of the countryside. Important to recognise influences on this character that combine to a sense of place, and set a tract of countryside apart from adjacent areas.</p>	The document contains no targets or indicators.	The East of England's landscape character should be considered when drafting the plan and siting new development.	The SA Framework should include an objective on protecting and enhancing landscape character and quality.
Ipswich Economic Development Strategy 2013 – 2026 (Ipswich Borough Council)			
<p>The economic development strategy will focus on job creation and retention, as well as promoting and attracting investment to Ipswich, reflecting core aims in the Council's Corporate Plan – 'Building A Better Ipswich1'.</p> <p><u>Vision statement</u></p> <p>"Ipswich will be an inspiring and exciting town perceived as both an attractive location for investment in business and a centre of excellence for education. Creative people in partnership with dynamic businesses will drive a diverse and innovative urban economy. A sustainable and low carbon Ipswich will enable individuals to flourish, and inhabitants will be notable for their enterprise, ambition, creativity and pride in their town"</p>	There are no specific targets and indicators.	The plan should seek to facilitate regeneration and economic growth across Ipswich.	The SA Framework should include objectives that support sustainable economic growth.
Building a Better Ipswich (Ipswich Borough Council Corporate Plan 2012)			
The new corporate plan for Ipswich consists of 6 themes and it reveals that the council's priority is to attract new investment and jobs to Ipswich by helping to boost private	1. A stronger Ipswich Economy:	The Corporate Plan identifies priorities within Ipswich which should be	The SA Framework should include objectives that support the economy

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

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>winning support from local residents and stakeholders as well as achieving external funding.</p> <p>The new strategy has six themes with key actions to provide a focus for investment and decision-making over the next 3 years:</p> <ol style="list-style-type: none"> 1. Responding to the national pressure on public spend 2. Developing the Cultural Economy 3. Improving and sustaining what we have 4. Increasing participation in cultural activity 5. 2012 Olympic Legacy 6. Ambitions for the future 	<p>Seek to improve our facilities where we can and ensure they are well maintained and run by qualified customer focussed staff.</p> <p>Encourage communities to become involved in the management and maintenance of their local facilities.</p> <p>The Council will work with partners, including the County Council, Nations and Regions East, private providers and the third sector to provide opportunities and a lasting legacy linked to 2012.</p> <p>Secure £10m investment in a new Centre of Excellence for Arts & Culture, combining the existing Ipswich Museum with adjacent buildings: Ipswich Art School; Wolsey Studio and; High Street Exhibition Gallery, to create a truly world class facility and tourist attraction, providing a source of pride and inspiration for the community.;</p> <p>Establish a new sports village focussed on Gainsborough Sports Centre with more sporting facilities including improved football/all weather pitches, cycling facilities etc.;</p>		
Ipswich Environment Strategy 2010 (Ipswich Borough Council)			
<p>This overarching Strategy explains how we deliver environmental performance through different areas of the Council's activities and its policies and strategies. This Strategy is not subordinate to other strategies. This Strategy will enable Ipswich Borough Council to improve its environmental performance by identifying and addressing environmental issues that are not covered by other policies and strategies; and by referencing and monitoring environmental actions that are addressed elsewhere.</p> <p>This document is driven by the Council's corporate strategy and its community strategy we set our strategic objectives.</p> <p>'Transforming Ipswich' identifies 6 key themes to develop performance:</p> <p>Clean & Green Ipswich</p>	<p>Seek to continually improve the cleanliness of Ipswich and seek to enhance the town through effective urban design</p> <p>Reduce waste by supporting initiatives that reduce, re-use and recycle</p> <p>Ensure that residents and businesses value the environment and take action to reduce environmental impact through education, campaigning and enforcement</p> <p>Ensure adequate open spaces and amenity areas are available</p> <p>Protect and enhance biodiversity, by managing, developing and interpreting our valuable natural habitats and sensitive wildlife sites</p> <p>Monitor air, land, water and noise pollution within the Borough and take measures to minimise local pollution consistent with sustainable development principles</p>	<p>The plan should seek to maximise environmental benefits across the borough as part of new development.</p>	<p>The SA Framework should include objectives that maximise benefits to the environment.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Expanding Ipswich</p> <p>Safe Ipswich</p> <p>Strengthening Communities in Ipswich</p> <p>Travel Ipswich</p> <p>Vibrant Ipswich</p> <p>The primary theme for this strategy is Clean and Green Ipswich:</p> <p><i>'We will work with the community to make Ipswich a model urban clean and green place'</i></p>	<p>Reduce carbon emissions by encouraging and supporting initiatives that promote renewable energy and energy efficiency</p>		
The Ipswich Health and Wellbeing Strategy (Ipswich Borough Council 2011 – 2016)			
<p>The vision is to improve the health and wellbeing of the people of Ipswich and support them in adopting a healthy lifestyle</p> <p>Priorities:</p> <p>To develop and implement an action plan to meet the vision</p> <p>Reduce health inequalities</p> <p>Promote healthy lifestyles and healthy communities</p> <p>Collate local information on health and wellbeing issues and to address them</p>	<p>No indicators.</p>	<p>The plan should promote healthy lifestyles, e.g. providing new recreational facilities, areas of open space, footpaths, cycle routes etc.</p>	<p>The SA Framework should include objectives promoting healthy lifestyles and improved health.</p>
Ipswich Housing Strategy 2010/11-15/16 (Ipswich Borough Council)			
<p>Vision:</p> <p>Everyone in Ipswich should have the opportunity to rent or buy a decent home at the price they can afford, in a sustainable community where they want to live and work</p> <p>Priorities:</p>	<p><u>Priority 1</u></p> <p>Improving strategic links</p> <p><u>Affordable housing targets:</u></p> <p>To be provided on sites of 0.5hectares or more, or 15 units or more</p> <p>The amount to be provided is 35% and a minimum of 65% of this must be provided as social rented housing</p> <p>Continued supply of new affordable homes</p>	<p>The plan should ensure that new housing meets an identified need across Ipswich, taking into consideration, quality, housing type, density, affordability, location etc.</p>	<p>The SA Framework should include objectives, indicators and targets that support new homes e.g. providing an appropriate balance of housing types.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Improve housing supply and improving neighbourhoods through a mix of high quality, environmentally sustainable homes for sale or rent</p> <p>Improving housing quality and environmental sustainability</p> <p>Supporting and including vulnerable adults, hard to reach groups and all communities</p> <p>Doing the basics better for less</p>	<p>Balanced, sustainable communities</p> <p>Balance of large and small affordable homes</p> <p>Target for at least 65% of new affordable homes to rent</p> <p>Meeting gypsy and traveller pitch needs</p> <p>New housing that meets the needs of all communities</p> <p>Right mix of new market, affordable and specialist housing for older people</p> <p>New homes for people with care and support needs, and adapted homes</p> <p>New homes for students in balanced communities</p> <p>Environmental sustainability</p> <p>Improved housing supply through the best use of existing stock</p> <p><u>Priority 3:</u></p> <p>Effective housing and neighbourhood management through partnership working</p> <p><u>Priority 4:</u></p> <p>All housing services to represent good value for money</p> <p>Tenants and residents are involved in decision making</p>		
Ipswich Town Centre Master Plan (Ipswich Borough Council, 2012)			
<p>The Town Centre Master Plan provides a view of what Ipswich Borough Council and stakeholders agree is the way forward to achieve an enhanced town centre in Ipswich. The 15-year plan has an end date of 2027. It complements the adopted Core Strategy and Policies Development Plan Document and other relevant policy documents.</p> <p>The aim is to enhance, remodel and develop the town centre, delivering a programme of regeneration and renewal which builds on the aspirations to be a regional centre for shopping and culture.</p>	<p>The document contains no targets or indicators.</p>	<p>The plan should be consistent with the approach identified within this master plan.</p>	<p>The SA Framework should include objectives that seek to facilitate regeneration not only within Ipswich town centre but borough wide.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
Ipswich Open Space and Biodiversity Policy/Strategy 2013-2023			
<p>This policy establishes guiding principles for the provision and management of green space within Ipswich Borough, and recommends a strategy for its protection and enhancement so that it can be enjoyed by future generations.</p> <p>Vision statement:</p> <p>'To safeguard, protect and enhance biodiversity and the environment and improve everyone's quality of life by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefiting the whole community'</p>	<p>Ensure the provision and management of public open space meets customer needs, now and over the next 10 years.</p> <p>Ensure the natural environment, trees and wildlife is afforded appropriate protection.</p> <p>Ensure the Council operates within the law and where possible adheres to best practice.</p> <p>To raise awareness of the benefits and value of good quality, accessible, biodiversity rich public open space.</p> <p>Identify priorities for future investment and thus ensure best use of available resources.</p> <p>Provide appropriate guidance through the planning process to ensure new public open space is appropriately located, of a high quality and meets local needs.</p> <p>Plan for and mitigate the effects of climate change.</p> <p>Improve the quality of the public realm, natural environment and local heritage.</p> <p>Build social cohesion and encourage healthy lifestyles through a well planned and managed 'green space' infrastructure.</p> <p>Create a delivery plan for green infrastructure provision,</p> <p>Ensure any cross boundary provision is properly coordinated and managed and</p> <p>Ensure heritage parks and heritage features within our parks are afforded appropriate protection.</p>	<p>The strategy identifies principles for the provision and management of green space which should be taken into consideration in the plan.</p>	<p>The SA Framework should include objectives that seek to protect and enhance local biodiversity.</p>
Tree Management Policy (Ipswich Borough Council, 2010)			
<p>The Tree Management Policy will allow the council:</p> <p>To continually develop an integrated approach to tree management that embraces all aspects of the council's tree</p>	<p>No relevant indicators.</p>	<p>The plan should promote effective tree management within Ipswich.</p>	<p>The SA Framework should consider the</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>related activities in a coherent and co-ordinated tree programme.</p> <p>To promote awareness of the value of trees in our environment.</p> <p>To interpret the policy framework.</p> <p>To give direction and guidance to local initiatives both public and private.</p>			importance of tree management.
Allotment Strategy 2014-2020 (Ipswich Borough Council, 2005)			
<p>A successful strategy will bring allotments into public focus advertising the benefits for all, resulting in increased lettings and improved standards.</p> <p>This will be done by developing a service in which people can expect good security and facility provision. Increased promotion as an activity for all should encourage people of all backgrounds to develop their skills as new gardeners.</p> <p>The aims of the allotment strategy are:</p> <p>to raise the awareness of others to the benefits of allotments for all leading to an increase in the number of plot holders</p> <p>to set a standard for the provision of allotments in Ipswich</p> <p>to improve the standard of service provision</p> <p>to investigate ways to improve the financial position of the service</p> <p>consider the demand for allotments both now and in the future</p> <p>review and propose changes if required to the provision and distribution of allotment land in Ipswich.</p>	No relevant indicators.	The plan should identify new allotment space within Ipswich if there is a proven need.	The SA Framework should seek to provide new areas of open space for communities to come together and enjoy.
Ipswich Housing Market Area Strategic Housing Market Assessment 2012			

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>This document updates the 2008 Strategic Housing Market Assessment (SHMA) for the Ipswich Housing Market Area, which comprises: the districts of Babergh, Mid Suffolk and Suffolk Coastal, and the Borough of Ipswich. This update is a hybrid between a straight- forward review of the data and an entirely new assessment.</p>	<p>Currently, there is a backlog of over 4,000 households in need of a suitable and affordable home in the Ipswich HMA.</p> <p>The supply of new affordable homes and the reuse of existing stock are not sufficient.</p> <p>In order to address this shortfall, 70% of all new homes in the Ipswich HMA currently being planned would need to be affordable.</p> <p>The needs are greatest in Ipswich with an annual need for at least 584 more homes to be affordable. Need within Suffolk Coastal is the next greatest at 355, in Mid Suffolk 229 are required and 134 more affordable homes are needed each year in Babergh.</p>	<p>The plan should include seek to maximise affordable housing to meet current and future needs of residents.</p>	<p>The SA Framework needs to include objectives that relate to the choice, quality, diversity and affordability of housing.</p>

Mid Suffolk District Council Core Strategy Focused Review adopted December 2012			
This document was produced as a focused review of the adopted Core Strategy (2008) to update certain sections with recent information.	To update certain sections of the 2008 Core Strategy.	The plan should seek to complement the vision, objectives and strategy within the Core Strategy – particularly as a residual number of homes required by residents in Ipswich would be constructed in neighbouring authorities.	The SA Framework should be mindful of the vision, objectives and strategy.
Babergh Core Strategy and Policies 2011-2031 (Babergh District Council, 2014)			
The Core Strategy & Policies provides a high-level strategic plan for Babergh for 20 years from 2011-2031. The policies are intended to be broad and general, overarching policies outlining the strategy for growth and steering growth to sustainable locations.	No specific indicators or targets of relevance in this plan or programme.	The plan should seek to complement the vision, objectives and strategy within the Core Strategy – particularly as a residual number of homes required by residents in Ipswich would be constructed in neighbouring authorities.	The SA Framework should be mindful of the vision, objectives and strategy.
Community Cohesion Policy (Ipswich Borough Council, 2009)			
<p>This policy provides Ipswich Borough Council's position in respect of achieving community cohesion in Ipswich. It identifies the development of community cohesion as a result of engagement and empowerment in Ipswich.</p> <p>Objectives:</p> <p>Identify issues which undermine relations within and between community members.</p> <p>Select and initiate responses that address these issues in a proportionate and prioritised way.</p> <p>Ensure equality of opportunity.</p> <p>Integrate new arrivals into the community and build a sense of belonging.</p>	No specific indicators or targets of relevance in this plan or programme.	The plan should include measures to promote community.	The SA Framework should include objectives that relate to promoting community cohesion.

Promote understanding and acceptance between different community members.			
Equality and Diversity policy (Ipswich Borough Council, 2010)			
The policy sets out the Council's commitment to taking effective action to eliminate discrimination and to promote equality of opportunity and diversity in all that it does as an employer, a service provider and as a community leader.	No specific indicators or targets of relevance in this plan or programme.	The plan should seek to reduce discrimination and promote equality and diversity within Ipswich.	The SA Framework should include objectives that reduce discrimination and promote equality within Ipswich.
A Fairer Ipswich Equality Scheme 2012-15 (Ipswich Borough Council)			
The purpose of this scheme is to set out a corporate equality and diversity strategy for the next 3 years and how Ipswich council intend to meet their Equality Duty under the Equality Act 2010.	<p>Staff are to undertake equality and diversity training to ensure they achieve the necessary competencies appropriate to their job roles in delivering the Council's Equality Duty.</p> <p>Set out clearly to our staff and customers why we are collecting information, how it will be used and more importantly to assure them of confidentiality and data security. Staff will receive training on obtaining information from customers in an appropriate and sensitive manner.</p> <p>Undertake equality analysis to help services identify any negative adverse impacts and to consider appropriate measures to mitigate the risks of disadvantage and discrimination.</p>	The plan should promote equality and reduce discrimination in the region.	The SA Framework should include objectives that relate to equality and discrimination.
Homelessness Strategy 2008-13 (Ipswich Borough Council)			
The Homelessness Strategy re-affirms the Council's commitment to responding to the challenges set by central government by continuously improving services and working with partner agencies and stakeholders in order to prevent and alleviate homelessness and to help people maintain accommodation.	<p>The key targets of this strategy are:</p> <p>Encourage homeless prevention</p> <p>Support vulnerable people</p> <p>Tackle the wider causes of homelessness</p> <p>Help people move away from rough sleeping</p> <p>Provide more settled homes</p>	The plan should seek to reduce homelessness in Ipswich.	The SA Framework should include objectives that seek to reduce rough sleeping and homelessness in the area.
Ipswich Development and Flood Risk SPD 2014			
Guidance to facilitate the planning permission process is provided in SPD particularly with regards to flood risk	No specific indicators or targets of relevance in this plan or programme.	The plan should seek to avoid development in Flood Zone 3.	The SA should include an objective directly related to managing flood risk.

vulnerability and flood zone 'compatibility'. Flood resilient measures are also included as part of the guidance.			
Haven Gateway Green Infrastructure Study 2008			
The strategy appraises and identifies standards for delivering enhancements to the existing ANG network. The criteria for defining Accessible Natural Greenspace (ANG) were developed. The existing ANG provision was appraised to identify deficiencies in provision based on four accessible natural greenspace standards (as developed by English Nature [now Natural England] in 2003, adapted by the Town and Country Planning Association and agreed by the Steering Group).	<p>The following set of standards (based on those promoted by the Town and Country Planning Association) has been used.</p> <p>People should have access to:</p> <ul style="list-style-type: none"> • 2ha+ of ANG within 300m of home – this has been termed the Neighbourhood Level • 20ha+ of ANG within 1.2km of home – the District Level • 60ha+ of ANG within 3.2km of home – the Sub-regional Level • 500ha+ of ANG within 10km of home – the Regional Level 	The plan should ensure that sufficient land is allocated for greenspace / open space and where necessary improve access.	The SA should take into consideration the proximity of new development to open space and green infrastructure and seek improve access further.
Open Space and Biodiversity Policy / Strategy 2013 - 2023			
The Open Space and Biodiversity Policy examines the provision of open space in terms of its quantity, quality, accessibility and management, identifying opportunities to increase supply, improve standards and satisfy demand. The Open Space and Biodiversity Policy underlines the importance of this land asset in meeting social and environmental needs, providing a very cost effective way of delivering a variety of benefits across all sections of the community and serving as a 'quality of life' indicator.	In terms of the provision of shading and greening, Ipswich Borough currently has approximately 12% tree canopy cover. Currently Ipswich does not have a time related tree canopy cover goals. A realistic standard to aim for in Ipswich is 22% by 2050.	The plan should ensure that sufficient land is allocated for greenspace / open space and where necessary improve access.	The SA should take into consideration the potential loss of open space and canopy cover due to new development and provide suggestions to mitigate this.
Turning our Town Around - Advancing our Vision to create East Anglia's Waterfront Town			
<p>The Ipswich Vision is to create 'East Anglia's Waterfront Town' and demands:</p> <ul style="list-style-type: none"> ▪ A town centre that will attract new investment ▪ A town centre that is true to its history ▪ A town centre that is bold and ambitious ▪ A town centre that recognises the need for change ▪ A town centre that will excite those who visit it ▪ A town centre that will appeal to those beyond its immediate catchment 	No specific indicators or targets of relevance.	The plan should be mindful of the vision	The SA Framework should ensure objective, targets and indicators reflect the message of the vision.

Appendix B

Baseline Data

B. The Sustainability Baseline

6.5 Population

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

- Total population (2011 Census and Neighbourhood Statistics⁸).
- Projected population growth to 2035 (Office for National Statistics Local Profiles⁹)
- Area of Ipswich Borough (Office for National Statistics Local Profiles).
- Population density (Office for National Statistics Local Profiles).
- Age structure of the population (Office for National Statistics Local Profiles and 2011 Census).
- Mean household size (Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012).
- Percentage of single pensioner households (Neighbourhood Statistics¹⁰).
- Ethnic groups represented in the population (Office for National Statistics Local Profiles).

Ipswich has the highest population of all the districts within Suffolk. The population of the Borough has increased 1.5% per year since 2001, and between 2011 and 2014 from 128,300 people to 135,000, an increase of 6,700 (representing 5.2%). Ipswich has a relatively young population with 86,700 (64.2%) of working age which is 4.3% more than the average for the rest of Suffolk. Table B-1 below indicates the trend in population growth from 2001 to 2014. Table B-1 shows a relatively high level of growth across the Borough which is an indication why such a large number of new homes is considered necessary within Ipswich. The increase in population resulted from a mix of natural change (births – deaths) and net migration.

Table B-1 Population Change

Date	Population Estimate	Difference
2014*	135,000	+300
2013	134,700	+1,300
2011	133,400	+5,100
2010	128,300	+1,700
2009	126,600	+1,200

8

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

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

10

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

4 <https://www.nomisweb.co.uk/reports/Imp/la/1946157241/report.aspx>

Date	Population Estimate	Difference
2008	125,400	+2,300
2007	123,100	+800
2006	122,300	+700
2005	121,600	+2,100
2004	119,500	+1,400
2003	118,100	+700
2002	117,400	+200
2001*	117,200	-

*Populations are not estimates they are from the 2011 and 2001 Censuses and ONS Nomis

Source: Neighbourhood Statistics and the 2001 and 2011 Census and ONS Nomis

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

The Borough of Ipswich covers 3,900ha. In 2011, the population density of Ipswich was 3,435.4 people per ha, significantly higher than the population density for Suffolk (1.9 people per ha) and that for England (4.1 people per ha). The Borough's fairly high population density trend is anticipated to continue to 2035 based on projected population growth rates.

Ipswich has a younger age profile and small boom in children under 5. Figure B-1 presents the age structure of the Borough based on 2012 mid-year statistics.

Figure B-1 Population Structure of Ipswich

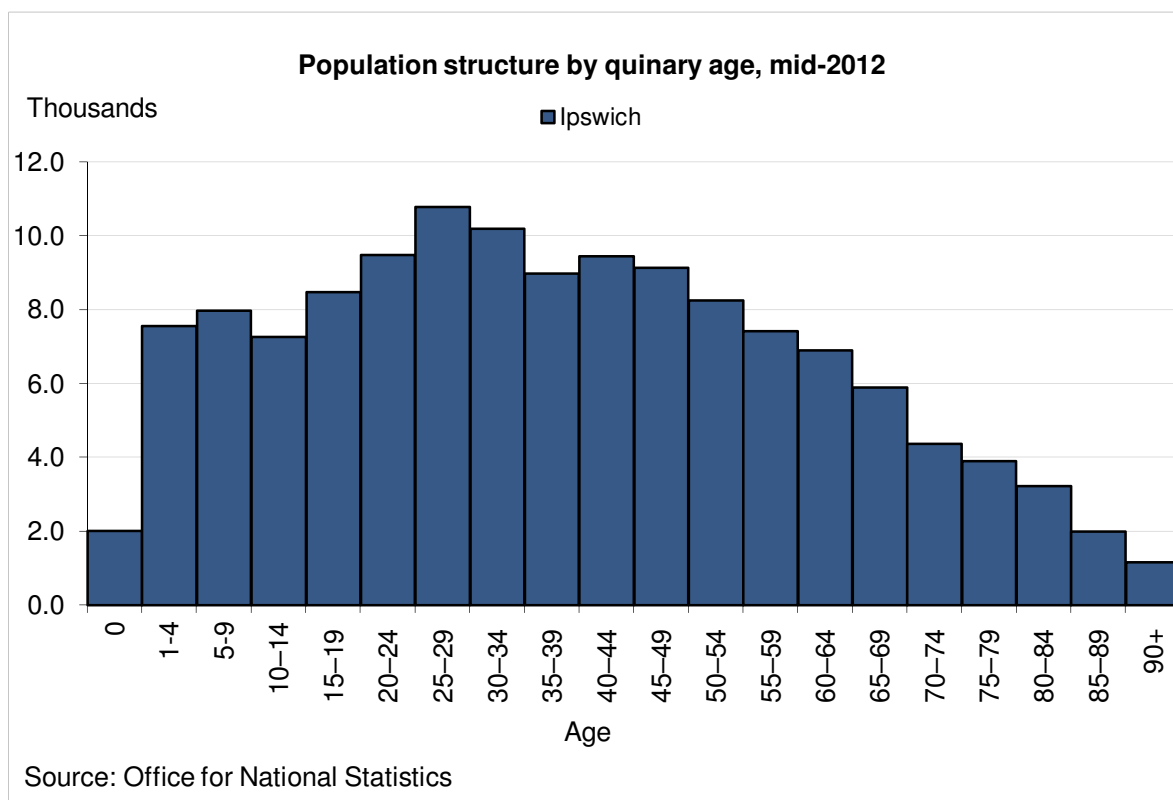
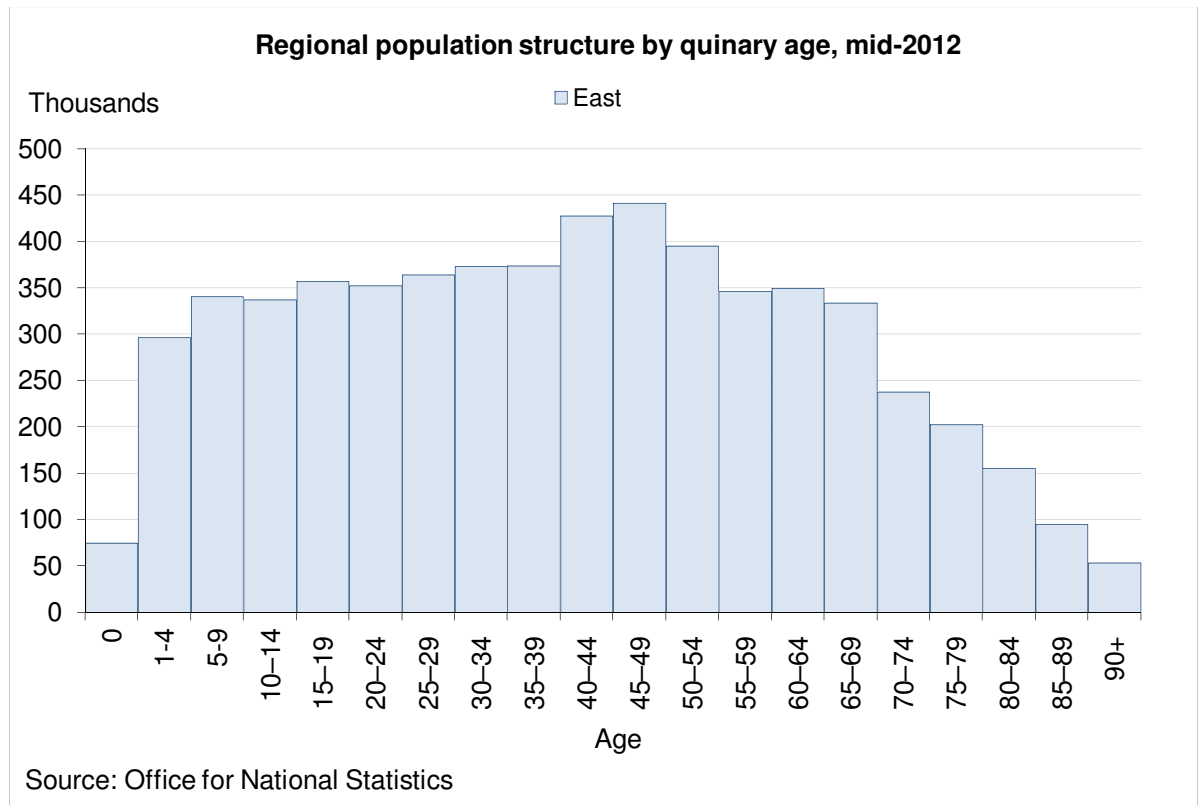


Figure B-2 presents the East of England regional age structure based on the 2012 mid-year statistics.

Figure B-2 Regional Population Structure



The average household size in the East of England stood at 2.29 people per household in the 2011 Census and it is anticipated it will be about 2.17 by 2033 (Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012). By 2033, the most common household type will be one person living alone; currently there are 6,750 of those over 65 who live in one person households. These single people will constitute nearly 50% of all households, with the actual number nearly doubling over the next twenty-five years. The number of lone parent households will have increased substantially too. Couple households with one or more other adult will see a decline of 20% as will “Other households” (includes lone parent households with all children non dependant) which are predicted to decrease by a third.

Ipswich has a relatively multicultural population. 2011 Census data indicated that 88.9% of the population of Ipswich were white, which is slightly lower than that for the East of England (90.8%) and slightly higher than that for England (87.1). Asian / Asian British are the main ethnic minority within Ipswich, representing 4.8.3% of the population (Population Estimates by ethnic group, Office for National Statistics).

Data Gaps and Uncertainties

- Population and household forecasts vary according to the assumptions made, but tend to be upwards. The projections used for this assessment are based on data and models

included in Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012.

Key Issues and Opportunities

- 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.
- Services need to consider the diverse and comparatively young population with parent and child friendly services.

6.6 Education and Qualifications

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

- Percentage of pupils achieving five or more GCSEs at Grades A* - C (including Mathematics and English) or equivalent (Office for National Statistics Local Profiles).
- Percentage of people aged 16-64 who have attained a Level Four NVQ or higher (NOMIS).
- Percentage of the population aged 16-74 with no qualifications (NOMIS).
- Most Deprived LSOAs for education, skills and training (Department for Communities and Local Government (DCLG)).

During the 2013 – 2014 school year in Ipswich 43.7% of pupils at the end of Key Stage 4 were achieving 5+ A*-C GCSE s or equivalent including English and Mathematics, which is less than the average for the East of England (57.0%) and England (56.6%).

Levels of educational attainment show a clear link to levels of affluence in later life, as access to employment improves with academic success. In 2014, there were 8,600 people in Ipswich with no qualifications; accounting for 9.8% of the population aged 16 to 64. Those with no qualifications in the East of England accounted for 8.1% of the population and within England 8.8%. Therefore this shows that Ipswich's performance is slightly worse than regional and national performance. In 2014, 26.4% of the population aged 16 - 64 had a Level 4 NVQ and above qualification, lower than the regional and national levels (33.1% and 36.0% respectively).

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

9 wards have LSOAs that fall within the bottom 20% most deprived for education, skills and training. These are, Rushmere, Gipping, Stoke Park, Bridge, Whitehouse, Alexandra, Sprites, Castle Hill and Gainsborough (DCLG 2015 Indices of Multiple Deprivation).

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

Data Gaps and Uncertainties

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

Key Issues and Opportunities

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

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

6.7 Health

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

- Percentage of the resident population who consider themselves to be in good health (2011 Census).
- Life expectancy at birth for males and females for the period 2007 – 2013 (Office for National Statistics Local Profiles).
- Distribution of and GPs and dentists (Ipswich Borough Council).
- Distribution of sports facilities (Active Places¹¹).
- Percentage of people participating in one session of moderate sport per week (Sport England Active People Survey 9).
- Proportion of live births with low birthweight. (ONS, Local Profiles).
- Conception rate of under-18 year olds (per 1,000) (Office for National Statistics Local Profiles).
- Most Deprived LSOA for health deprivation and disability (Department for Communities and Local Government (DCLG)).
- Play and open space quality, quantity and accessibility (Ipswich Open Space, Sports and Recreation Facilities Study 2009).

In Ipswich, the proportion of live births with low birthweight in 2012 was 6.7%. This was lower than that for 2011 (6.8%), and was greater than that for 2004 (6.2%). The proportion of live births with low birthweight in 2012 was the same as the proportion in the East of England region (6.7%) and lower than the England figure (7.0%). Amongst all year 6 children the prevalence of obese children in 2010/11 was 18.7%. This prevalence of child obesity in reception year in Ipswich for 2010/11 was greater than the East of England's proportion (17.7%) and greater than the proportion for the Borough in 2009/10 (16.7%) suggesting increasing trend. In 2011-2013, life expectancy from birth for females in Ipswich was 83.2 years which was slightly less than that for the East of England (83.8 years). For males this was 79.2 which was 1.1 years less than that for the East of England. Table B-2 presents these findings.

Table B-2 Life Expectancy at Birth 2007 -2013

	2007-2009		2007-2009		2010-2012		2011-2013	
	Males	Males	Males	Females	Males	Females	Males	Females
Ipswich	78.1	78.1	78.9	83.2	79.3	83.4	79.2	83.3
East of England	79.3	79.3	79.9	83.6	80.1	83.7	80.3	83.8
England	78.3	78.3	78.9	82.9	79.2	83.0	79.4	83.1

¹¹ <http://www.activeplaces.com/Index.asp?Authorise=true>

	2007-2009		2007-2009		2010-2012		2011-2013	
	Males	Males	Males	Females	Males	Females	Males	Females
Suffolk	79.6	79.6	80.3	84.0	80.6	84.1	80.7	84.1

Source: Neighbourhood Statistics, Office for National Statistics

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

The under 18 conception rate in the Ipswich Borough in 2013 was 29.4 per 1000, compared to 21.0 per 1000 across the East of England and 24.3 per 1,000 in England as a whole. This represents a decrease for Ipswich from 48.9 per 1000 in 2007.

11 wards within Ipswich have LSOAs within the bottom 20% most deprived for health deprivation and disability. These are Heath, Alexandra, Bridge, Stoke Park, Gainsborough, Gipping, Whitehouse, Priory Heath, Whitton, Sprites and Westgate.

Ipswich has a large proportion of 'Retirement Home Singles' aged 81+ which require leisure activities. The large amount of open space in the surrounding districts and the presence of parks within the Ipswich Borough provide an excellent recreational resource for the population that should be maintained / enhanced to secure health benefits. According to the Ipswich Open Space, Sports and Recreation Facilities Study 2009 overall provision of open space sites in Ipswich is considered to be very good especially in relation to parks. However, issues with accessibility and locational deficiency were believed to exist, particularly in the north east of the Borough. A number of sites are deemed to lack character, such as on Bramford Lane.

Sports facilities across the Borough are found in and around Ipswich town centre and at the main sports centres. Research from Sport England indicates that 34.3% of people in Ipswich Borough participate in one session a week of moderate intensity sport for at least 30 minutes, higher than the 32.6% who do so in Suffolk but lower than the 34.6% for the East of England (Sport England, Active People Survey 9 (2014/15)). This represents a 1.7% increase since 2005/06. The quality and quantity of indoor sports facilities was generally thought to be good. However, there are some notable issues in terms of the 'tired' condition of Crown Pools and the lack of a two court basketball hall with spectator seating and potentially a 50 metre swimming pool for elite swimming development. The leisure centres are generally perceived to be well used although there are car parking issues (Ipswich Open Space, Sports and Recreation Facilities Study 2009).

Information on open space provision is contained in the Landscape section below.

Data Gaps and Uncertainties:

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

Key Issues and Opportunities

- There is a need to reduce social isolation and promote physical participation to promote health and wellbeing with all the residents of Ipswich, but particularly those over 50 and children.

6.8 Crime

The following baseline data has been identified:

- Crime rates per 1000 of the population for key offences including burglary (Office for National Statistics Local Profiles).
- Robbery Offences (State of Ipswich Report May 2014)

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. In 2012, out of the 1185 violence with injury offences recorded, 709 of these were experienced in the night-time economy hours, measured during the hours of 18:00-06:00. The top two offending types of crime in the context of volume are theft and handling (excluding vehicle crime) and violence with injury. Concerning theft and handling, in 2011 32% of Suffolk based offences were recorded in Ipswich, typically in the central area where 49% of this offending type was reported.

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

There has been a decrease in robbery offences in from 203 to 154 total offences for Ipswich from 2011-2012, with over 54% of Suffolk's robberies occurring in the Ipswich area. Most of these are taking place in Central Ipswich. In 2008/09 the overall crime rate¹² in Ipswich (71.2) was significantly higher than county (37.4), regional (40.4) and national levels (49.7). However, this reduced to 59.5 in 2009/2010 and 58.2 in 2010/11. Table B-3 presents the total recorded crime in Ipswich (per thousand persons) from 2008-2012. Those recorded crimes per 1000 of Ipswich's population have fallen from 106 in 2008-2009 to 77 in 2013-2014.

Table B-3 Total Recorded Crime (per thousand persons)

Year	2008	2009	2010	2011	2012
Ipswich	106	107	100	103	92
Suffolk	65	64	63	63	57
East of England	69	64	61	60	55
England	84	78	73	71	69

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

Data Gaps and Uncertainties

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

Key Issues and Opportunities

- Continue to support the reduction in crime rates

6.9 Water

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

- River catchment areas (Environment Agency East Suffolk Catchment Flood Management Plan, 2009).
- Historic flood events (Ipswich Borough Council Strategic Flood Risk Assessment 2007).

¹² British Crime Survey Comparator shows the overall crime rate per thousand persons.

- Distribution of areas at risk of fluvial flooding (Environment Agency Flood Map¹³) and 2010/11 Annual Monitoring Report, Ipswich Borough Council).
- Number of planning applications granted permission contrary to Environment Agency advice (Ipswich Local Plan Authority Monitoring Report 9, 2012-2013).
- Water and groundwater quality (Environment Agency¹⁴)
- Anglian Water Resources Management Plan (Anglian Water, 2015)

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

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

In 2013/14 the Environment Agency was consulted 19 times and no objections to proposals were raised (Ipswich Borough Council, September 2014).

In 2012/13 the EA was advised of 21 applications in Ipswich where flood risk or water quality was an issue. Of these, 16 were approved, one was withdrawn, three were refused, and one has been approved contrary to the EA's initial objection. Whilst an objection was raised by the EA, this was owing to the lack of a Flood Risk Assessment (FRA) rather than an in principle objection to the proposed development. In this case the former fire station development on Sidegate Lane was approved for 59 dwellings subject to relevant EA planning conditions (Ipswich Local Plan Authority Monitoring Report 9, 2012-2013).

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

The Anglian Water Resources Management Plan reports that Ipswich is within an area of 'severe water stress'.

¹³ [http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=616500.0&y=244500.0&topic=floodmap&ep=map&scale=9&location=Ipswich, Suffolk&lang=_e&layerGroups=default&distance=&textonly=off#x=616500&y=244500&lg=1,&scale=8](http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=616500.0&y=244500.0&topic=floodmap&ep=map&scale=9&location=Ipswich,Suffolk&lang=_e&layerGroups=default&distance=&textonly=off#x=616500&y=244500&lg=1,&scale=8)

¹⁴ http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=groundwater&layerGroups=default&lang=_e&ep=map&scale=8&x=616500&y=244500&x=616500&y=244500&lg=1,&scale=7

Date Gaps and Uncertainties

- Daily domestic water use (per capita consumption, litres)

D. Key Issues and Opportunities

- Reduce the risk of flooding to new development and existing properties.
- Support the sustainable use of water resources.

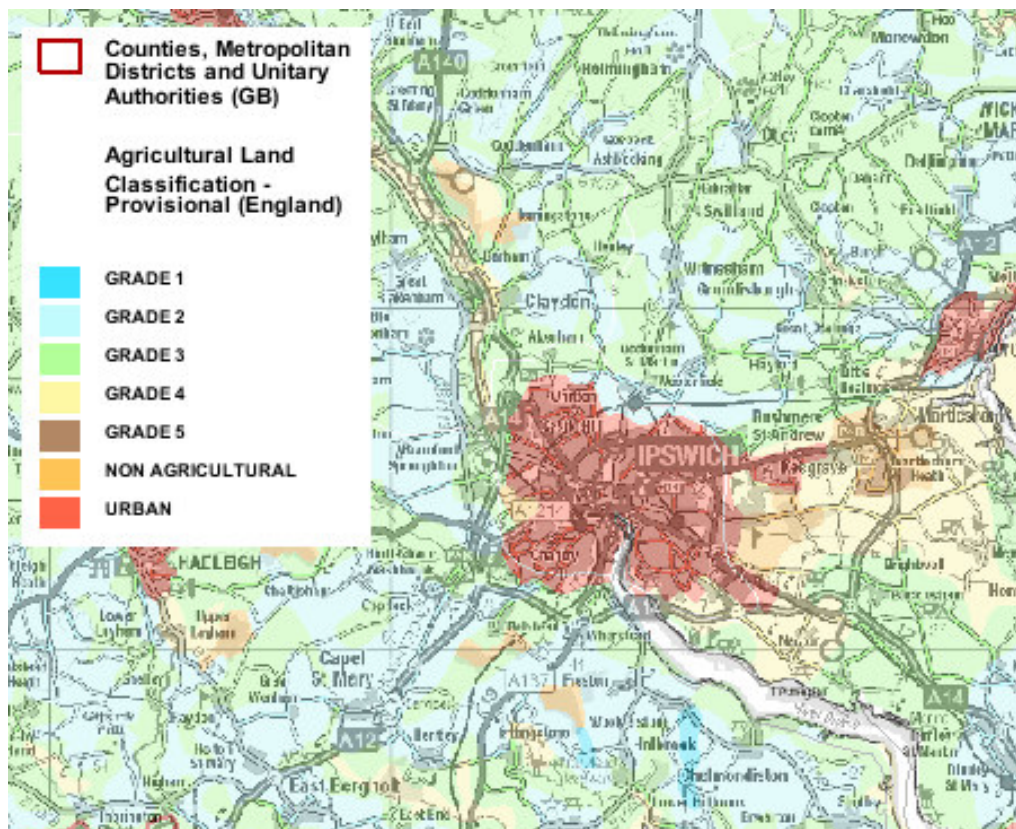
6.10 Soil and Land Quality

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

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

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

Figure B-3 Agricultural Land Classification



Source: www.magic.gov.uk

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).

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

Table B-4 Previously-developed land

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

Source: Department for Communities and Local Government (DCLG)

The density of new build dwellings is 45.2 per hectare or 55.2 per hectare if including the assisted living units on Handford Road (Ipswich Borough Council, September 2014).

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

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

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

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

Data Gaps and Uncertainties

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

Key Issues and Opportunities

- Protecting soil resources
- Continuing to develop brownfield sites

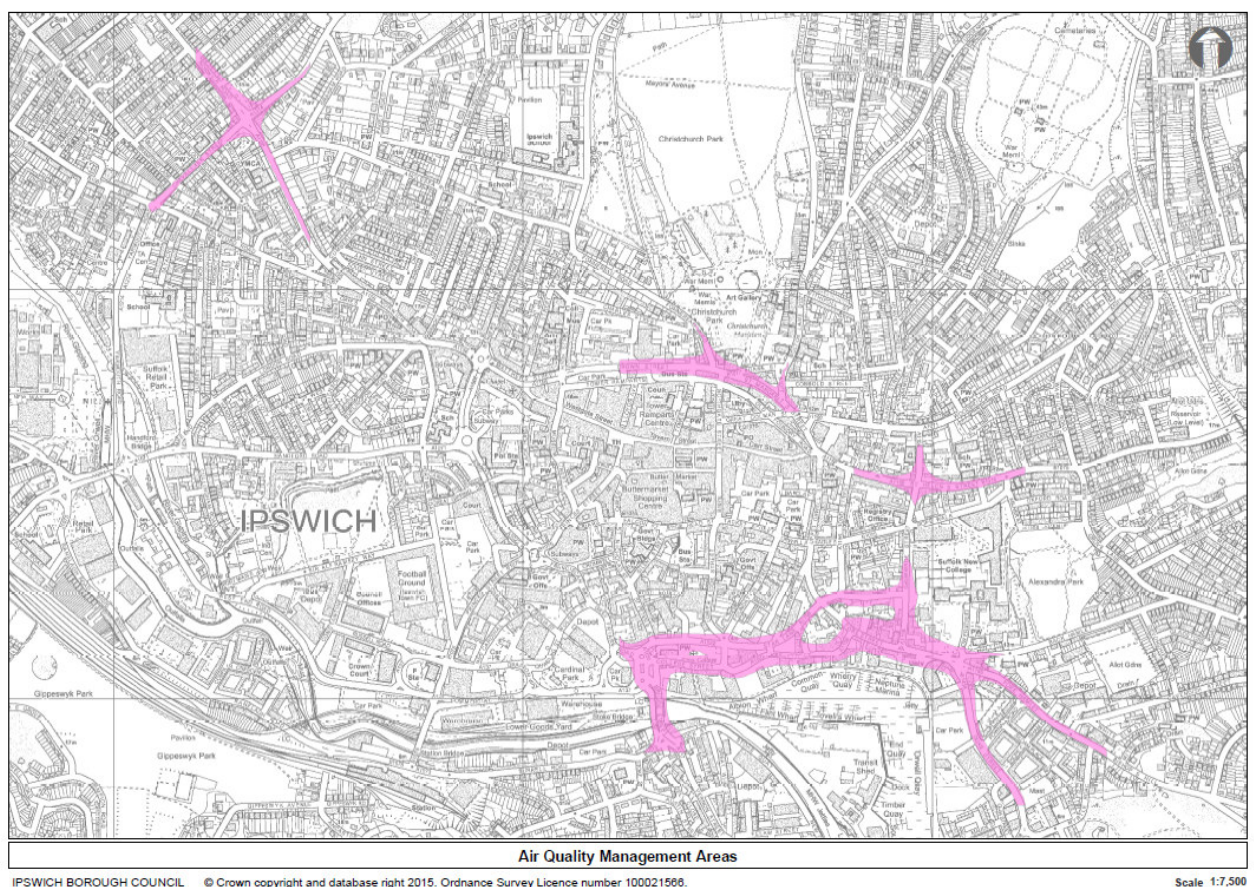
6.11 Air Quality

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

- Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive¹⁵)

Air quality affects the state of the natural environment and has implications for human health. It is estimated that air pollution attributed to 5.6% (63) of all deaths in 2010 from the population of Ipswich aged 25 and over. AQMAs are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. There are four AQMAs within the Ipswich Borough and all have been declared due to levels of nitrogen dioxide exceeding the annual average objective level. Their locations are presented on Figure B-4. Variations to the AQMA boundaries are under consideration due to a small number of monitoring results showing exceedance of the nitrogen dioxide annual mean objective outside of the existing AQMAs, and a small number of monitoring results showing achievement of the objective within the existing AQMAs. The main source of air pollution in the Borough is road traffic (2010 Air Quality Detailed Assessment for Ipswich Borough Council).

Figure B-4 Air Quality Management Areas in Ipswich



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

Data Gaps and Uncertainties

- Dwellings affected
- Long term trends are uncertain.

¹⁵ http://aqma.defra.gov.uk/aqma-details.php?aqma_id=442

Key Issues and Opportunities

- Minimise any impacts on local air quality, particularly through traffic

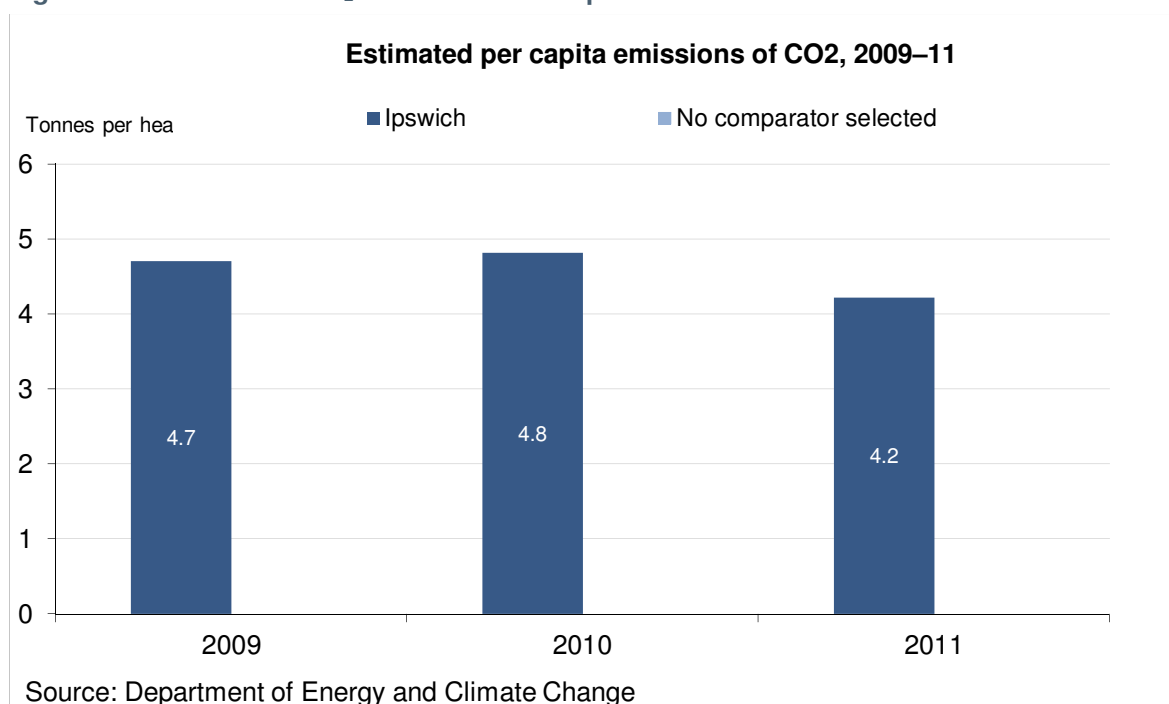
6.12 Energy and Climate Change

The following baseline indicators have been used:

- Total carbon dioxide (CO₂) emissions per capita (DECC and Ipswich Local Plan Authority Monitoring Report 9, 2012-2013)
- Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles).
- All energy consumption by sector (Office for National Statistics Local Profiles and DECC).
- Applications for renewable energy developments (2010/11 Annual Monitoring Report Ipswich Borough Council).

Although climate change is a global phenomenon, action to avoid its most serious effects and to minimise the emission of greenhouse gases needs to occur at a local level. The Borough will not be immune to the impacts of climate change, either directly or as a result of policy responses at the national and international levels. In 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; this is shown in Figure B-5.

Figure B-5 Estimated CO₂ Emissions Per Capita.



Ipswich has the second lowest carbon footprint in Suffolk (2011). Total CO₂ emissions have reduced by 22% (165,000 tonnes) from 729,000 tonnes to 564,000 tonnes between 2005 and 2011. This is a greater reduction, as a percentage of total emissions, than the rest of Suffolk (11% - 568,000 tonnes) and East of England (15% - 6,850,000 tonnes) (State of Ipswich Report, 2014). Ipswich Borough Council is committed to reducing its carbon emissions from the 2007/08 baseline by 30% by 2013 and by 50% by 2021. This equates to over 3,000 tonnes of CO₂ the equivalent of the output of 300 homes (Ipswich Borough Council, Impact Carbon Management Plan 2009). During the period 2005-2011 CO₂ emissions in Ipswich reduced by 28.8% to 4.2 tonnes per capita. If the level of reduction seen up to 2013 continues, it is

expected that the areas targets for CO₂ reductions will be met (Ipswich Local Plan Authority Monitoring Report 9, 2012-2013).

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

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

Table B-5 Energy consumption by sector

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

Source: DECC

There were no applications for renewable energy developments in 2013/14 (Ipswich Borough Council, 2014). However, the Council's policy DM2 which requires 15% of energy for certain developments to be from low carbon and decentralised sources was applied 24 times during 2013/14 and 29 times during 2014/15.

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

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

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

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

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

Data Gaps and Uncertainties

- Level of energy efficiency in homes

Key Issues and Opportunities

- Promote energy efficiency within new development
- Minimise emissions related to transport

6.13 Biodiversity, Flora and Fauna

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

- Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and County Wildlife Sites (CWS) (MAGIC, SBRC, www.magic.gov.uk).
- Areas of woodland, including ancient woodland (www.magic.gov.uk).
- Key Biodiversity Action Plan (BAP) species and habitats present (Suffolk BAP).
- Geodiversity sites (www.geosuffolk.co.uk)

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

There are three SSSIs located within the Borough; Stoke Tunnel Cutting (2.2ha), Bixley Heath (5.08ha) and the Orwell Estuary (1335.52ha). SSSIs represent the Country's very best wildlife and geological sites. The Stour and Orwell Estuaries are also designated as a SPA under EC Wild Birds Directive¹⁶ due to their importance for estuarine bird populations. In addition the estuary is also an internationally designated Ramsar site.

Ipswich also contains six LNRs and 20 CWSs. The CWSs total 266.87ha and during 2014/15 there was a net gain in area of 36.45ha.

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

Suffolk's Priority Habitats and a sample of the Priority Species, identified through the Suffolk Biodiversity Action Plan, are listed below. The full list of Priority Species are included within the Action Plan¹⁷.

- **Priority Habitats**
 - Hedgerows
 - Traditional Orchards
 - Open Mosaic Habitats on Previously Developed Land (Brownfield)
 - Wood Pasture and Parkland
 - Lowland Heathland & Acid Grassland
 - Lowland Calcareous Grassland
 - Mixed Deciduous Woodland
 - Arable Field Margins
 - Reedbeds

¹⁶ Council Directive 79/409/EEC on the conservation of wild birds

¹⁷ <http://www.suffolkbiodiversity.org/biodiversity-action-plans.aspx>

- Saltmarsh and Mudflats
- Coastal and Floodplain Grazing Marsh
- Lowland Meadows
- Wet Woodland
- Fens
- Rivers and Streams
- Coastal Sand Dunes
- Coastal Vegetated Shingle
- Maritime Cliffs and Slopes
- Ponds
- Saline lagoons
- Seagrass Beds
- Sheltered Muddy Gravels
- Mud Habitats in Deep Water
- **Priority Species**
 - Mammals
 - *Bats (grouped plan)*
 - *Brown hare Lepus europaeus*
 - *Dormouse Muscardinus avellanarius*
 - *European otter Lutra lutra*
 - *Harbour porpoise Phocoena phocoena*
 - *Red squirrel Sciurus vulgaris*
 - *Water vole Arvicola terrestris*
 - *Water Shrew Neomys fodiens*
 - Amphibians and reptiles
 - *Great crested newt Triturus cristatus*
 - *Natterjack toad Bufo calamita*
 - *Adder or Northern Viper Vipera berus*
 - Birds
 - *Bittern Botaurus stellaris*
 - *Grey partridge Perdix perdix*
 - *Skylark Alauda arvensis*
 - *Song thrush Turdus philomelos*
 - *Stone curlew Burhinus oedicnemus*
 - *Bullfinch Pyrrhula pyrrhula*
 - *Corn Bunting Miliaria calandra*
 - *Linnet Carduelis cannabina*
 - *Nightjar Caprimulgus europaeus*

- *Reed Bunting* *Emberiza schoeniclus*
- *Barn Owl* *Tyto alba*
- *Spotted Flycatcher* *Muscicapa striata*
- *Tree Sparrow* *Passer montanus*
- *Turtle Dove* *Streptopelia turtur*
- *Woodlark* *Lullula arborea*
- *Little tern* *Sterna albifrons*
- Invertebrates
 - *Cornflower* *Centaurea cyanus*
 - *Greater Water-parsnip* *Sium latifolium*
 - *Shepherd's needle* *Scandix pectiniveneris*
 - *Pillwort* *Pilularia globulifera*
 - *Red-tipped Cudweed* *Filago lutescens*
 - *Small-flowered Catchfly* *Silene gallica*
 - *Spreading Hedge-parsley* *Torilis arvensis*
 - *Tassel Stonewort* *Tolypella intricata*
 - *Tower Mustard* *Arabis glabra*
 - *Native Black Poplar* *Populus nigra ssp.betulifolia*
 - *Unspotted Lungwort* *Pulmonaria obscura*
 - *Man orchid* *Aceras anthropophorum*
- Plants
 - *Cornflower* *Centaurea cyanus*
 - *Greater Water-parsnip* *Sium latifolium*
 - *Shepherd's needle* *Scandix pectiniveneris*
 - *Pillwort* *Pilularia globulifera*
 - *Red-tipped Cudweed* *Filago lutescens*
 - *Small-flowered Catchfly* *Silene gallica*
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 - *Tower Mustard* *Arabis glabra*
 - *Native Black Poplar* *Populus nigra ssp.betulifolia*
 - *Unspotted Lungwort* *Pulmonaria obscura*
 - *Man orchid* *Aceras anthropophorum*
- Lichens and fungi
 - *Orange-fruited elm-lichen* *Caloplaca luteoalba*
 - *Sandy stilt puffball* *Battarraea phalloides*
 - *Starry breck-lichen* *Buellia asterella*
 - *Oak Polypore* *Buglossoporus pulvinus*

Source: Suffolk BAP¹⁸

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

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

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

Table B-6 Geodiversity sites in Ipswich

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

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

Data Gaps and Uncertainties

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

¹⁸ <http://www.suffolkbiodiversity.org/biodiversity-action-plans.aspx>

Key Issues and Opportunities

- Protect and enhance nationally and internationally designated sites
- Protect and enhance locally designated sites
- Protect and enhance priority habitats and conditions for priority species

6.14 Cultural Heritage

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

- Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (www.magic.gov.uk).
- Number of Listed Buildings / Scheduled Monuments / Conservation Areas and Registered Historic Parks and Gardens on Historic England's 2015 East of England Risk Register (Historic England Scheduled Monuments at Risk East of England, 2011).
- Number of eligible open spaces managed to Green Flag standards (Civic Trust and Ipswich Borough Council).

In Ipswich there are 603 Listed Buildings, of which 11 are Grade I and 31 are Grade II* (Ipswich Borough Council, Listed Buildings in Ipswich). Of these 6 Grade II buildings are identified as being 'at risk'. In addition, according to Historic England's 2015 'At Risk' Register there is one statutory heritage asset considered to be 'at risk' which is the Grade II* St Mary at the Quay, Quay Street, Ipswich. In general the building is in poor condition with major drainage issues with severe water penetration of masonry at low level. Listed Buildings are largely concentrated within the town centre. There has been little change in the number of listed buildings in the Borough since 1995.

There are also 15 Conservation Areas covering the historic areas of the Borough, each of which has a Conservation Area Appraisal and Management Plan.

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

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

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

According to Historic England's 2015 'At Risk' Register there is one

The Civic Trust and DCLG administer the Green Flag Award, given for the quality and management of parks and other public open spaces. Two of parks within the Borough have been accredited with the Green Flag status; Christchurch Park and Holywells Park (Ipswich Borough Council July 2011). These are also the only two eligible open spaces managed to Green Flag standards (Ipswich Borough Council, September 2014).

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

Data Gaps and Uncertainties

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

Key Issues and Opportunities

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

6.15 Landscape

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

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

The Suffolk Landscape Character Assessment identifies Ipswich town centre as urban, with some areas of ancient rolling farmlands to the north and northeast and estate sandlands to the east of the urban areas (Suffolk Landscape Character Assessment¹⁹).

No National Parks are located within the Borough's boundary (www.magic.gov.uk). However, a very small section of the Suffolk Coast and Heaths AONB is located within proximity of the southern Borough boundary.

The Natural England Suffolk Coast and Heaths and the South Suffolk and North Essex Clayland national character area profiles identify recent developments such as Ravenswood and development at the west of Ipswich as effecting change in the landscape.

Christchurch Park, 33 hectares in size, was given its eighth Green Flag award in July 2015 in recognition of its excellent use of green space, well-maintained facilities and high standard of safety and security. Holywells Park was awarded its fifth Green Flag award in July 2015. Ipswich has over 518ha of open space, sports and recreation facilities.

Data Gaps and Uncertainties

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

Key Issues and Opportunities

- Ensure future development protects and enhances landscape character

6.16 Minerals and Waste

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

- Amount of household waste collected per household (Defra).
- Location and number of waste facilities serving the Borough (Suffolk County Council).

¹⁹ http://www.suffolklandscape.org.uk/landscape_map.aspx

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

The Suffolk Minerals and Waste Development Framework (MWDF) contains mineral and waste specific policies for use in determining planning applications for waste or quarry developments in Suffolk. It sets out the strategy for future minerals and waste development and addresses issues including mineral extraction; waste management and recycling; protecting mineral resources and restoring minerals and waste sites (www.suffolk.gov.uk). In Ipswich, 499kg of residual waste was recorded per household in 2012/13. This is less than the waste per household in the East of England (525kg) and England overall (568kg). From 2010/11 to 2011/12, the amount of residual waste in Ipswich reduced on average by 13kg per household compared with a reduction of 30kg for the East of England region (Defra).

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 2008-2012. (results are presented in Table B-7) (Defra).

Table B-7 Household Waste Recycling and Composting Achieved

	Rate Achieved 2008/09 (%)	Rate Achieved 2009/10 (%)	Rate Achieved 2010/11 (%)	Rate Achieved 2011/2012 (%)
Ipswich	41.1	40.2	42.0	42.5
Suffolk	48.4	50.6	53.8	53.2
East of England	44.5	46.1	48.8	49.7
England	37.6	39.7	41.2	43.0

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

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

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

The Suffolk Annual Waste Survey 2009 indicated sales of recycled aggregate to be 257,497 tonnes, and this was less than the average yearly forecast of approximately 500,000 tonnes, identified in the Minerals Core Strategy. This also reflected the downturn in the economy. In 2012/13 there was an 8.5 year landbank of sand and gravel in Suffolk, exceeding the national requirement for 7 years. Suffolk relies on imports of hard rock for aggregate use from elsewhere in the country. The recently constructed energy from waste plant at Great Blakenham just outside of Ipswich is a local source of recycled aggregates. During 2010/11, one application at Waldringfield (outside of Ipswich) was received for minerals extraction.

Data Gaps and Uncertainties

- There are no key data gaps or uncertainties.

Key Issues and Opportunities

- Reduce the need for natural resources and promote the use of recycled and secondary materials in construction projects and new development.

6.17 Transportation

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

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

The population of Ipswich grows with working commuters. The daytime population is 5% (6152) higher than the night-time resident population. Alexandra Ward has the biggest population increase through commuters with a population change of 131% from 9,700 (night-time population) to 22,433 (Daytime population); it is likely that a majority of this increase is through residents moving within Ipswich from another ward. Suffolk, on the other hand, shrinks between the daytime and night-time population by 3% (18,370).

Ipswich serves as an important employment centre for outlying areas with approximately 97,000 (Census 2011) people travelling to work each day in Ipswich. Central Ipswich is the destination for almost 50% of these journeys. People living in Ipswich are on average travelling further to work in 2011 (13.3km) than in 2001 (10.7km). The average distance for an Ipswich resident travelling to work increased between 2001 and 2011 by 2.6km (24%). Both of these factors suggest that an increasing number of residents are living in Ipswich and commuting further into the wider Ipswich hinterland.

In 2011, 7.4% of people in employment worked mainly from home and more than 50% of people travelled to work by car or van. The percentage of people working from home is lower than that for England (10.64%). The percentage of people travelling to work by car (53.44%) is similar to that for England (53.71%).

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

Table B-8 Journey to Work By Mode

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

Source: Census 2011

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

Significant development within and around Ipswich could increase the transport pressures that currently exist within the town. Traffic modelling shows that without mitigation by 2031 a number of junctions within and around Ipswich will have exceeded their capacity, although the modelling shows that a significant number of additional trips relate to background growth rather than development. . It will be important to ensure that transport is fully integrated with the development plans for these locations. Many peak hour journeys in Ipswich are fairly short and yet are carried out by car. Congestion levels are already seen as a significant problem (Suffolk County Council, Local Transport Plan 2011 – 2031; Ipswich Travel Model Assessment, 2010).

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

All housing developments of ten or more dwellings completed in Ipswich during 2010/11 were within 30 minutes travel time by foot and public transport of a GP, primary and secondary school, employment area and major retail centre. However, two developments were not within 30 minutes travel time of a hospital by public transport (Ipswich Borough Council 2010/11 Annual Monitoring Report). In 2013/2014, there were seven applications within 30 minutes travel time of a GP,

primary and secondary school, employment area and major retail centre (Ipswich Borough Council, September 2014).

Data Gaps and Uncertainties

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

Key Issues and Opportunities

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

6.18 Economy

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

- Location of key industries and major employers (Ipswich Borough Council).
- Economic activity rate (ONS – Nomis).
- Employment by sector (Office for National Statistics Local Profiles).
- Employment by occupation (ONS – NOMIS).
- Percentage of resident population claiming Jobseekers' Allowance in 2012 (ONS – Nomis).
- Average weekly pay (2011 State of Ipswich Report, Ipswich Borough Council).
- Employment land availability (Employment Land Availability 2012 Report).
- Planning permissions for employment sites (Employment Land Availability 2012 Report).
- Vacant retail units (Ipswich Local Plan District and Local Centres survey 2015 and Central Shopping Area Identified Frontages Survey 2015)

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

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

- Public Sector.

Table B-9 below shows the change in employment by sector between 2012 and 2013 in Ipswich/.

Table B-9 Ipswich Jobs 2012-2013 by Sector

Industry	2012	2013	Change	% Change
Agriculture	0	0	0	0
Energy and Water	0	1100	1100	1100
Manufacturing	2900	2400	-500	-17.24
Wholesale and retail, including motor trades	9900	10300	400	4.04
Construction	2600	2300	-300	
Transport storage	4000	4000	0	0
Accommodation and food storage	3900	4100	200	
Information and Communication	1600	1600	0	5.12
Financial and other business services	14400	15200	800	5.55
Public admin and Education	21400	22400	1000	4.67
Other services	2800	3000	200	7.14
Total	63500	66400	2900	4.56

Source: Ipswich AMR 2013-2014

Despite the economic downturn the Borough's economy continues to perform well when compared to other districts across the East of England. This is in part due to the high concentration of public sector employment within the Borough, with approximately 27.6% of people employed in the public sector in 2012 (ONS Employment Local Profiles). There has been a general increase in jobs from 2012 to 2013 within sectors 6 sectors as shown within Table B-9.

Ipswich has a large working age (16-64 population 65.7% (87,566) compared with the rest of Suffolk, 61%. Around 5,500 (5.7%) of residents have never worked or are long-term employed. The economic activity rate measures the proportion of the adult population in paid employment, unemployed actively seeking employment or who are full-time students. The figure of economically active people in employment for Ipswich was 72.9% between April 2013 - March 2014, slightly lower than for the East of England (75.5%) and higher than that for Great Britain (71.7%). In August 2014 2.7% of the resident population were claiming Jobseekers Allowance, compared to 1.7% in the East and 2.3% across England (NOMIS²⁰).

²⁰ <https://www.nomisweb.co.uk/reports/lmp/la/1946157241/report.aspx#tabempunemp>

A lower than average proportion of Ipswich's population are classified as managers or senior officials (Ipswich – 5.5%, East 11.0%, Great Britain 10.2%), while caring, leisure and other service occupations along with sales and customer service occupations and process plant and machine operatives are higher than regional and national averages. This data is presented in Table B-10.

Table B-10 Employment by Occupation (Jul 2014 – Jun 2015)

Employment	Ipswich (%)	East of England (%)	Great Britain (%)
Managers, directors and senior officials	6.8	10.6	10.3
Professional occupations	17.9	19.8	19.7
Associate professional and technical	14.5	14.2	14.0
Administrative and secretarial	5.8	11.1	10.6
Skilled trades occupations	10.7	11.5	10.7
Caring, leisure and Other Service occupations	6.7	8.9	9.2
Sales and customer service occupations	10.5	7.1	7.7
Process plant and machine operatives	9.6	6.1	6.3
Elementary occupations	16.2	10.4	10.8

Source: NOMIS

On average, the gross weekly pay for employees in Ipswich is £483.3 (2015), which is lower than the East of England average (£551.0) and lower than the national average (£529.6). Part of the reason for this is because the gross weekly pay for female workers at £391.3 is significantly behind that for males in Ipswich (£551.6) and the national average for females (£471.6) (NOMIS 2015).

The total amount of employment land available was 71.94 ha across the whole of Ipswich at April 2014. The total consists of 3.81ha with unimplemented planning permission, 18.73ha on allocated land and 49.4ha of vacant land within identified employment areas. Completions on allocated and existing employment sites for 2013/14 were 1.34ha.

Planning consents for employment sites (over 100 sqm) for the year 2013/14 amounted to 3.62ha and the total permitted floorspace was 33,993sqm. .

According to the District and Local Centres report 2015 there are 68 (10.3%) vacant retail units in the Borough's local and district centres and 103 vacant units (16.4%) in the Central Shopping Area. This is higher than the national average for town centres of 10.4%²¹.

Data Gaps and Uncertainties

- Commercial / retail rental data.
- Business start-ups and closures.

²¹ ://www.spring-board.info/uk/reports/JAN2015-VACANCY-SURVEY-RESULTS. Note that the two surveys should not be directly compared due to differences in methodology.

- No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site.

6.19 Deprivation and Living Environment

The following baseline data has been identified:

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

In 2015 five wards have been identified with LSOAs in the bottom 10% most deprived for living environment. These are Gipping, Westgate, St Margaret's, Holywells and Alexandra.

Deprivation is a multi-faceted and complex problem which influences and is influenced by a wide range of factors. In general, between 2007-2010, all Local Authorities in Suffolk became relatively more deprived (NB data does not include the effects of the credit crunch and recession). According to the Index of Multiple Deprivation (2010) 26.6% (35,000) of the town's population lives within the most deprived fifth of areas in England. Ipswich remains the most deprived Local Authority in Suffolk being ranked 87/326 in England (Waveney 112/326; The number of people living within the most deprived 20% of areas has risen by 2.5% (3,200) suggesting that Ipswich has become comparatively more deprived since 2007. Mid Suffolk 274/326), and all of the areas ranked in the bottom 20% of Suffolk are found in either Ipswich or Lowestoft. All of the Suffolk lower super output areas (LSOAs) ranked in the worst 10% of England in 2010 (14) are in Ipswich (9) 64% and Lowestoft (5) 36%. The Bridge Ward had the only LSOA to have moved out of the worst 10% ranking, but LSOAs in Whitton and Stoke Park dropped in rank sufficiently to fall into this group.

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

Data Gaps and Uncertainties

- Provision of childcare.

Key Issues and Opportunities

- Provision of land to support employment development.
- Supporting existing retail centres.

6.20 Housing

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

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

- Number of dwellings (Ipswich Borough Council and Ipswich Local Plan Authority Monitoring Report 9, 2014-15).

Since 2001, the number of dwellings in Ipswich has increased by 7,984 dwellings. The total housing stock rose from 58,303 at 31st Mar 2010 to 59,721 at 31st March 2015. In 2009 the composition of housing was 14.2% (8210 dwellings) Local Authority stock, 7.8% (4510 dwellings) Registered Social Landlord stock, and 77.8% (44982 dwellings) private housing stock (2011 State of Ipswich Report, Ipswich Borough Council). Housing completions between 2012-13 were the lowest since 1998-99, with just 96 new homes completed – 604 short of the 700 requirement. However in more recent years completions have increased with 166 in 2013/14 and 411 in 2014/15. In addition, 124 assisted living units were completed between 1st April 2012 and 31st March 2015.

Housing costs are relatively low but have gradually increased in recent years. The Median house price (July 2013) in Ipswich was £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 in August 2013) (ONS).

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

In Ipswich, the number of affordable homes provided in 2014/15 was 202 (49% of completions excluding assisted living). A total of 1,856 affordable homes have been completed since April 2001, equating to 24% of all completions (excluding assisted living).

The number of homeless people has been increasing since 2010. During 2012/13, 617 people were identified as homeless in Suffolk according to the statutory criteria compared to 368 in 2010/2011 and 500 in 2011/2012 (Suffolk Observatory). In 2014/15 144 people were identified as being homeless and in priority need which was a rate of 2.4 people per 1,000, the same as the England rate.

At November 2014 there were 972 vacant dwellings (Ipswich Borough Council, November, 2014). This shows a decrease from 2011 when there were 1,909 vacant dwellings and from 2012 when there were 1,750. Of the 972 vacant homes 306 were long term vacant properties (i.e. over 6 months). It is not stated as to what types of dwellings are vacant i.e. there could be a low demand for large expensive homes yet a high demand for affordable homes.

At 1st April 2013, Local Authority dwelling stock was 8,110; Private Registered Provider dwelling stock was 4,770; Other Public Sector dwelling stock was 160 and Private sector dwelling stock was 46,650. This totalled 59,690 (Ipswich Borough Council, September 2014).

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

Table B-11 Dwelling Stock by Tenure (2011)

	Local Authority Dwelling Stock (%)	Registered Social Landlord Dwelling Stock (%)	Shared Ownership (%)	Owner Occupied and Private Rented Dwelling Stock (%)
Ipswich	14.20	7.39	0.64	78.0
East of England	7.80	7.90	0.73	83.9

England	9.43	8.27	0.79	82.0
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Source: Census 2011, ONS

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

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

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

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

- On average, incomes in the Ipswich Housing Market Area (HMA) remain below both regional and national levels. Earnings in Ipswich are well below those in the rest of the HMA. This update estimates that 41% of newly forming households are not able to afford to rent or buy a home within the Ipswich HMA.
- Worsening affordability of housing reduces the rate that young adults form households. One effect has been for more young people to live with their parents. Nationally, around one in three men and one in six women aged 20 to 34 now live with their parents, an increase from one in four men and one in seven women in 1997.
- A lack of choice of housing affects mobility within the labour-market and, therefore, the economy. There are also local spatial implications for the Ipswich HMA if this trend continues such as:
 - an even greater need for affordable housing in the least affordable areas;
 - greater household formation in more affordable areas such as Ipswich, increasing the birth-rate which increases demand for schools for example; and
 - further commuting from more affordable to less affordable areas.
- One consequence of an aging population is a reduced average household size as fewer households contain children and more single households are present.

- Currently, there is a backlog of over 4,000 households in need of a suitable and affordable home in the Ipswich HMA. The supply of new affordable homes and the reuse of existing stock are not sufficient. In order to address this shortfall, 70% of all new homes in the Ipswich HMA currently being planned would need to be affordable.
- With more older people being assisted to remain at home, the trend for larger homes to be under-occupied is likely to increase. This could have a knock-on effect of constraining the supply of homes. At the same time, older people will expect more choice on the type, quality and location of accommodation.

Data Gaps and Uncertainties

- Percentage of new dwellings meeting BREEAM standards.

Key Issues and Opportunities

- Meeting housing need.
- Provision of affordable housing.

6.21 Transboundary Issues

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

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

Appendix C

Consultation Comments

SA Scoping Report Comments 2014

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

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Natural England	General comment	We welcome the efforts made by Ipswich Borough Council in preparing the draft Scoping Report. We are satisfied at present that the Sustainability Appraisal of the Local Plan is proceeding in a proper, logical and comprehensive manner.	N/A
			Natural England	General comment - Approach to SA	We are pleased to see recognition of the Government's objectives for sustainable development. We would advise that reference is made to the requirement for a Habitats Regulations Assessment, required under the Conservation (Habitats and Species) Regulations 2010 to assess the effects of plans, programmes and projects on Ramsar sites.	Reference included in Chapter 1.
			Natural England	Scoping Process	We welcome reference to issues of importance to NE including landscape character, the protection and enhancement of biodiversity and geodiversity, green infrastructure, soils and climate change mitigation and adaption. We would recommend that the SA adopts a suitable topic based approach to assessment of the effects of Plan policies on the environment.	The topic based approach has been adopted through a selection of topic based SA objectives.
			Natural England	Scoping Process	In addition to statutory designated wildlife sites, the effects of the Plan on locally designated sites such as County Wildlife Sites, should be fully assessed through the SA process.	Locally designated sites such as County Wildlife Sites have been taken into consideration and effects on these sites have been assessed. In addition, in order to facilitate the assessment the location of the locally designated sites is shown in GIS maps supporting the assessment.
			Natural England	Scoping Process	The assessment should consider the inter-relationships between topics, for example a number of topics can have a significant influence on biodiversity such as air quality, noise, water quality and resources.	The inter-relationship between topics is considered throughout the assessment.

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

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Water	Much of Ipswich, an urban built-up environment and yet water quality has not been identified as a key sustainability issue. Most of the central and western area of Ipswich is designated as Source Protection Zone (SPZ) 2, with two smaller areas designated as SPZ1. SPZs are used to identify those areas close to drinking water sources, where the risk associated with groundwater contamination is greatest, and are important for identifying highly sensitive groundwater areas. SPZs are also recognised within the Environmental Permitting Regulations as a zone where certain activities cannot take place and should therefore be included in the list of key sustainability issues. New development should be encouraged to use Sustainable Drainage Systems (SuDS). These provide the opportunity not only to manage runoff and further reduce flood risk on development sites, as mentioned in the SA report, but also to help protect groundwater and surface water quality.	Water quality is picked up in the assessment framework through sustainability objective ET7. Recommendations to use SuDS are included in the sustainability appraisal. The SA report will include the wide variety of benefits of SuDS such as protection of groundwater and surface water quality.
			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Climatic factors	In this section, it is acknowledged that the risk of flooding may increase as a result of rising sea levels. While the Ipswich Flood Defence Management Strategy will help to reduce flood risk to some areas of Ipswich, it should not be solely relied upon as mitigation. Development should be directed to areas of low flood risk wherever possible, through the Sequential Test process, and highly vulnerable development should not be permitted in the high risk Flood Zone 3.	Considered in the assessment of policies. Where appropriate, recommendations for additional mitigation measures are suggested.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Biodiversity	The Scoping Report recognises that opportunities should be sought to develop and enhance the network of public open space. However, it fails to recognise the benefits that can be brought about by seeking opportunities to provide multifunctional open spaces that can help to reduce flood risk, to promote biodiversity and provide recreational areas. These areas can also be a draw for businesses who want to be able to provide an attractive environment to their workers and customers. The provision of both green and blue infrastructure is also important in helping wildlife adapt to the impacts of climate change.	Taken into consideration in the assessment of the revised policies.
			Environment Agency	Table 3-3 SA Objective ET7	Despite not being identified as key issue, we are pleased to note that Water Quality has been included in the SA Objectives. Indicator ET7a is 'water quality in rivers and groundwater quality'. This can be assessed through consideration of whether or not waterbodies are achieving 'good ecological status' or 'good ecological potential' under the Water Framework Directive.	N/A

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

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

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Suffolk Wildlife Trust	Part One Core Strategy Focused Review 3.3.13 Results from the Review	We support the identification of the objectives to 'conserve and enhance biodiversity as an integral part of economic, social environmental development' and the 'need to protect and enhance biodiversity resources particularly sites of international importance'.	N/A
			Suffolk Wildlife Trust	Appendix B	We recommend that ecological information including that on Country Wildlife Sites (CWS); veteran trees and protected Biodiversity Action Plan (BAP) habitats and species, available from Suffolk Biological Records Centre (SBRC) is used in collating a baseline for this appraisal.	Taken into consideration.
			Suffolk Wildlife Trust	Table 3-3 SA Objective ET8	Recommend that SBRC are included as a source of information under Objective ET8 in Table 3-3.	Included.
			Suffolk Wildlife Trust	5.5.1.2 Baseline Data	In para 5.5.1.2 we suggest that the same objectives are used as those identified in para 3.3.13. Specifically, 'conserve and enhance biodiversity as an integral part of economic, social and environmental development' and the 'need to protect and enhance biodiversity resources particularly sites of international importance'.	The same objectives are used for the assessment of both DPDs.
			Suffolk Wildlife Trust	Table 5-2 Issues and Opportunities	Suggest that the following wording is used in the "Key sustainability Opportunities" for "Biodiversity, Flora and Fauna". We consider that this better reflects the opportunities presented. <i>Development proposals should protect existing habitats and species and should maximise opportunities to enhance habitats or create new habitats in order to deliver the biodiversity objectives of the relevant BAPS. When allocating sites for development the current ecological value of the land should be taken into consideration, alongside the most appropriate use of the land and the proximity of the development to designated sites.</i>	N/A

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Suffolk Wildlife Trust	Appendix A	In 2012 the UK BAP (1994) was succeeded by the UK Post 2010 Biodiversity Framework (July 2012). The list of national plans and programmes in Appendix A should include reference to this document.	Included.
			Suffolk Wildlife Trust	Appendix B Section B-9	Appendix B Section B.9 should include reference to SBRC as a source of data for the first bullet point. This section should also be updated to make reference to the UK Post-2010 Bio Framework (July 2012) succeeding the UK BAP (1994).	Included.
			Suffolk Wildlife Trust	Map 1	Map 1 (Sites of Eco Importance). Update this map to include County Wildlife Sites. Whilst CWSs are recognised in the Scoping Report for the SA they should also be included on this map in order to show an accurate reflection of sites designated for their ecological importance across the borough.	CWSs are included in the GIS maps used in the assessment.
6	Brian	Samuel	Northern Fringe Protection Group	General comment / Appendix B - evidence based approach	A more robust and evidence-based approach for the SA is required that better takes account of the views of the general public which have been shown to be informed and accurate. The NFPG has always supported an employment-led strategy. However, we argued that IBC's Core Strategy (CS) was not sustainable and therefore unsound as it was based on job targets that had no supporting evidence base and were clearly unrealistic and unachievable. The previous SA failed to recognise these legitimate and material concerns and omitted any form of assessment of the implications of the jobs target being unrealistic. Evidence now shows that the jobs target was indeed unsustainable and that the original SA was incorrect in assessing the CS as sustainable.	The employment targets used in the adopted Core Strategy were based on the East of England Plan and its background data, and the 2005 Haven Gateway Employment Study. Delivery is a separate issue and is to do with economic recession.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	General Comment - consideration of alternatives	We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed.	The revised strategy set out in Core Strategy Focused Review combines a focus on development delivery with an approach which is policy compliant to the National Planning Policy Framework.
			Northern Fringe Protection Group	General comment - scope of SA	The SA needs to consider the implications of this key change in IBC's strategy and in particular consider the implications of new homes being constructed in Ipswich Borough that will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Previously one of the main arguments that the NF housing development is sustainable was that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. The SA of the NF will also need to be revised to take account of this.	The Council has prepared a topic paper on population and household projections and this considers the alternative strategies available to the Council including whether they are policy compliant and realistic in market and deliverability terms. It does not necessarily follow that a larger local workforce will be competing for a smaller number of jobs. For example, some of the population and household growth will be accounted for by people over the retirement age; some residents can travel to jobs using sustainable modes e.g. at Felixstowe, BT Martlesham or London; and at the 2001 Census there was net travel to work into Ipswich.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	General Comment - consideration of alternatives	We support Paragraphs 2.20 and 2.21 of the IBC Executive paper REF NO: E/13/60 Northern Fringe - Draft Supplementary Planning Document Ipswich Garden Suburb and Sustainability Appraisal confirming that the Core Strategy Focused Review (CSFR) 'will look at alternatives to the Northern Fringe allocation itself'. The Scoping study must include details of how this will be carried out. This should include a 'mapping' of the proposed sites of major employment and new homes in and around Ipswich and analysis of the potential impact and sustainability of likely travel routes. The process should also include an assessment of whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable.	See above re separate paper.
			Northern Fringe Protection Group	General Comment - Part One	Clearly sustainability is not just about building sufficient homes to meet anticipated demand but about wider social and environmental issues. The implications of a larger local workforce competing for a relatively smaller number of jobs, for example on average salary levels which have already fallen substantially in Ipswich, need to be fully considered in the SA of the CSFR. Lower average salary levels will inevitably result in higher levels of deprivation and poverty with associated health implications especially in relation to increased fuel poverty. Unless property prices fall to mirror lower average salaries, homes will become even less affordable.	See above. Also refer to City Deal which is being used to address skills issues in the workforce.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	General Comment - evidence base	The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the SA of the CSFR and in considering alternatives to the Northern Fringe allocation itself. Clearly this can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work.	The SA assesses the implication of each policy with regards to travel through <i>ET4 To reduce the effects of traffic upon the environment</i> and air pollution through <i>ET1 To improve air quality</i> .
			Northern Fringe Protection Group	General Comment - Part One / Consideration of alternatives	The SA of the CSFR must assess and compare the sustainability benefits of a realistic jobs-led CS to a housing-led strategy. This needs to include relative assessments of a co-operative approach between Ipswich Borough and neighbouring authorities where new homes are built near to the location of new jobs across. Such an approach is required under the NPPF requirement for local authorities to co-operate. We are concerned that the Ipswich Housing Market Area Strategic Housing has not taken full account of neighbouring authorities and could result in sub-optimal decision-making.	Refer to NPPF requirement to meet objectively assessed housing need. The Ipswich SHMA looked at the whole housing market area (Ipswich, Mid Suffolk, Babergh, and Suffolk Coastal).

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	General Comment - Part One / Consideration of alternatives	In particular, the SA of the CSFR needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sproughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the NF with residents commuting through Ipswich to access employment sites. The impact of utilising sites such as Grafton Rd, Cox Lane and Westgate for a larger number of new homes, rather than leaving them vacant, needs to be appraised.	Sugar Beet Factory site is outside IBC's control. Babergh Core Strategy identifies it for employment to meet job needs. People living there would still need to travel through Ipswich to job opportunities. Plan has to be realistic - in terms of Coastal and Babergh which have just completed Core Strategy processes and market delivery of housing on brownfield sites.
			Northern Fringe Protection Group	General Comment - Part One	The current CS allows for a phased approach for the development of the NF and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire NF without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full assessment of the rationale behind the proposed changes. This should include analysis of the comparative risks of unfinished sites and/or stalled developments being left on the NF for whatever reason. This is already a major problem for Ipswich in relation to the waterfront developments, as a result of the unsustainable multi-starts that were allowed to commence and become a major blight on Ipswich.	The SA of revised policy CS10 fully consider the implications of multiple starts compared to the original CS10. The majority of mitigation measures proposed to reduce significant negative effect will involve a number of infrastructure improvements (SuDS, pedestrian and public transport infrastructure such as bus stops, etc.) and multiple starts will allow a more comprehensive construction planning.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Stage A runs from September to October 2013 and includes this consultation process, which has a submission date of 28th November 2013. Clearly Stage A needs to be extended and allow time for the inclusion of comments from the consultation process.	Updated.
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Stage B, running to the end November 2013 does not provide sufficient time given the proposed shift to a housing-led strategy. The DPD assessment and evaluation process needs consider the relative merits of a realistic jobs-led strategy compared to a housing-led approach and the cross-boundary implications between Ipswich Borough and neighbouring authorities.	Updated.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Stage D. We object to the proposed consultation of the SA during the summer holiday period given its importance. We are pleased that IBC has listened to our concerns with other proposed major consultations being released over the Xmas holidays by commencing them in early January instead. We would be grateful if similar consideration be given to the scheduling of the SA consultation. The timetable should also allow for the SA to go before the Executive/Council.	IBC aims to avoid holiday periods but it is not always possible.
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Given the work required in the new SA and the previous delays/issues with the NF SPD appraisal, we have some concerns with the timescales. Sufficient resources need to be made available to ensure a robust SA is completed in a timely manner.	IBC has appointed consultants to undertake the work and they will provide the necessary resources.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	3.2.1 Review of Core Strategy	Paragraph 3.2.1 needs to reference the proposal for the Core Strategy to no longer be jobs-led but a housing-led strategy. The SA must compare and assess the relative benefits of these alternative strategic approaches and alternatives to the NF allocation itself as committed to by IBC in the recently approved Executive paper REF NO: E/13/60.	The emphasis now through the NPPF is on delivery so the strategy is more delivery focused. For housing it aims to meet needs, for employment local and regional strategies aim to play to the area's sectoral strengths.
			Northern Fringe Protection Group	3.3.2, 3.3.11, Table 3-1, PPPs	Paragraphs 3.3.2 and 3.3.11 and Table 3-1 need to specifically reference the CSs of neighbouring authorities and the critical work of the Ipswich Policy Area Board given the duty to cooperate and the proposed approach to build homes in Ipswich Borough for people working outside the Borough. These are more important than the New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013, which is more of a wish list than an evidence-based document. The quoted growth forecasts are out of date.	Table 3-1 just summarises the NALEP plan. Reference to the neighbouring Core Strategy is included.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	Table 3-1 PPPs	<p>Table 3-1 should refer to Ipswich Borough-specific data rather than quoting East of England data and should reference the most recent data e.g. the EEFM August 2013 modelling. This projects a lower level of jobs than previously.</p> <p>Population 2011: 133.7k 2031: 163.4k Increase: 29.7k (22.21%)</p> <p>Resident jobs 2011: 63.2k 2031: 71.4k Increase: 8.2k (12.97%)</p> <p>This means that additional residents will either have to commute outside of Ipswich Borough to find work or will be unemployed; neither of which is sustainable.</p>	Aug 2013 modelling results came out too late to inform this draft but will be taken into account in future drafts of the plan.
			Northern Fringe Protection Group	3.3.9 PPPs	The East of England Plan is no longer relevant.	3.3.10 indicates that it has been revoked.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	3.3.12 PPPs	PPPs needs to be defined here rather than later in the document.	Agreed and will be updated in final SA Report.
			Northern Fringe Protection Group	3.4.1.3 Question B	Ipswich Central's vision for Ipswich needs to be considered http://ipswichcentral.com/thebigdebate/ along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that 'St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared.'	The additional AQMAs have not yet been declared - boundaries are being considered.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	Table 3-2 Issues and Opportunities / Appendix B7	Table 3-2 needs to reference the proposed new AQMAs (as does Appendix B.7) as referenced above and utilise more recent data where available. There are also opportunities to improve cross-town transport infrastructure and access to the A14/A12. This will become a fundamental requirement if the CS is changed to housing-led as residents will need to be able to easily commute to employment sites outside the Borough.	See above
			Northern Fringe Protection Group	4.1 Geographical Scope	As the CSFR proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough.	<p>The purpose of the SA is not to undertake detailed transport assessments. That would be considered through transport modelling once 2011 Census Travel To Work data has been published.</p> <p>The SA assesses the implication of each policy with regards to travel through <i>ET4 To reduce the effects of traffic upon the environment</i>.</p>

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	4.2.1.1 Aspects of DPD to be assessed	Paragraph 4.2.1.1 needs to make clear that the proposed CSFR is no longer a jobs-led strategy but a housing-led strategy. To fail to mention this fundamental change is misleading and lacks transparency. Likewise the major proposed changes to CS10 need to be outlined here i.e. the intention to allow simultaneous multiple starts across all three areas of the NF without restricting the number of construction sites at any one time etc and prior to the agreement of a Masterplan also needs to be specifically mentioned.	See above.
			Northern Fringe Protection Group	4.2.2 Assessment of Alternatives	As stated above, the SA of the CSFR needs to assess the alternative of an evidenced-based jobs-led strategy. It also needs to assess the alternative of a phased and controlled development of the NF that does not allow multi-site starts or places restrictions on when the three areas of the NF can be developed and/or on the number of sites that can be developed in any one area at the same time.	Done through the assessment process of alternatives.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Northern Fringe Protection Group	6.2.2 Aspects of DPD to be assessed	Paragraph 6.2.2 the SA of site allocations DPD needs to consider the relative benefits of having new housing built in neighbouring authorities nearby new employment sites compared to housing being built in Ipswich that requires residents to commute to new employment sites outside of Ipswich. It also needs to assess the relative benefits of more housing being built in the town centre for example on the Westgate site as proposed in the Ipswich Central vision for Ipswich and on the Grafton Way site.	The SA cannot assess the effects of developments located outside the boundary of the Borough.
7	Barbara	Robinson	Save our Country Spaces	N/A	SOCS strongly object to the change by IBC within the SPD issued on 15th November by removal of text from 'Establishing Priorities' within its Chapter 2 Vision and Core Objectives for Core Strategy Policy Area CS10 as this is likely to have a significant adverse impact on the steer and sustainability of the Core Strategy Focused Review.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	General comment	SOCS to date have failed to see a Sustainable Development Strategy which outlines the over-arching Government objective to raise the quality of life in our communities referenced within the Hyder SASR. Assessed need is weak within the document.	Core Strategy sets out the sustainable development strategy. Assessed housing need will be identified in a separate paper. This scoping report sets the framework for the future assessment of the plans.

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

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

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

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Save our Country Spaces	General Comment / Appendix B	With regard to Sustainability Appraisals, Strategic Environmental Assessments and Scoping work, there has been criticism of the fitness for purpose of this vital work by the main residents groups. This may be in part due to paucity of available data and available information being provided by IBC at the outset to the independent company. It may have been in part due to unrealistic expectations by IBC as to the necessity and extent of the work which would be required.	This is the first stage in the SA for the Core Strategy Focused Review and Site Allocations DPD. Data have been made available and/or is accessible via the Internet.
			Save our Country Spaces	N/A	The initial failure of IBC to conduct a formal SEA Screening Exercise to evaluate potential social, economic and environmental impacts of their emerging plans for the Northern Fringe at the outset of the masterplanning work was unfortunate. If this had been addressed properly, it would have clearly demonstrated their obligation under the SEA Directive 2001/42/EC. The statement below from Executive paper E/13/60 26th November 2013, 2.2, finally validates resident groups' stance on this obligation with the final recognition and acceptance by IBC's Executive of obligation under the SEA Directive 2001/42/EC2 for the IBC's North Fringe/Ipswich Garden Suburb SPD. '2.2 The development of the Northern Fringe involves major challenges due to its large-scale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities.'	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	N/A	SOCS feel the following comment from Executive paper E/13/60 26th November 2013 is disingenuous and misplaced. (SOCS emphasis) '2.21 NFPG/SOCS were, at their request, afforded the opportunity to comment on earlier draft versions of the SEA/SA and their views are attached as appendices 3-5. The SEA/SA as well as the draft SPD has been amended in response, e.g. by removing sequencing diagrams which it is agreed were too prescriptive at this stage. However, many comments made by these groups conflate the principle of the	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
					development with its environmental effects.' If proper consideration of the environmental and wider concerns and had taken place in a timely fashion, then current difficulties with the scope of the SPD may have been avoided. SOCS always held the view it had been wrong to re classify the North Fringe work from a DPD to an SPD status. Rather than conflating the principle of development, SOCS believe the environmental effects and possible impacts are fundamental to that principle of development on Sustainability grounds. As already stated, an Environmental Impact Study will not be delivered until the end of the exercise and will be done by the developers; - almost at a point of no return- it is hard to securely ascertain whether the revision of the Core Strategy and changes to CS10 are sustainable.	
			Save our Country Spaces	General Comment	It appears, following SOCS conversation with Wild Anglia, that IBC have failed to meet their obligations to inform all Statutory stakeholders for the SASR. Does this mean the statutory notice period for consultation may need to be extended?	The Council consulted Wild Anglia on the draft Scoping Report but received no comments from them.
			Save our Country Spaces	Part One Core Strategy	The manner and delivery of last minute, poorly drafted revisions and additions to the Executive paper on the 15th October on CS10 were, in SOC's view totally unacceptable, and in breach of their own policies, (protocols and SCI) . The unacceptably poor practice, was possible outside proper process in the public's view. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the best public interest. SOCS consider this breach of process to be further example of maladministration and may pursue this as a complaint or further, at the appropriate time through examination of the CSFR. Whilst this may appear to digress from the purpose of this response to the SA Scoping Consultation, SOCS feel	This Scoping Report sets the framework for the appraisal of policies including revised CS10. The policy appraisal itself follows on from this scoping stage.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
					the above criticism of the process is key and material to it. SOCS is still unclear about the full future implications these last minute changes might have on the soundness and sustainability of the Core Strategy and DPD as there has been insufficient time to appraise this situation and seek our own independent legal opinion. It is SOCS (& NFPG) worry, that the changes and revision to CS10, are essentially so great and so fundamental a change in direction and steer for the Borough , that there may be seriously undesirable unintended consequences which should be properly referenced, appraised and evaluated within this SA Scoping report. The CS10 revision /changes currently are not even properly referenced nor track changed within the SASR.	
			Save our Country Spaces	Part One Core Strategy	It is SOCS (& NFPG) worry, that the changes and revision to CS10, are essentially so great and so fundamental a change in direction and steer for the Borough, that there may be seriously undesirable unintended consequences which should be properly referenced, appraised and evaluated within this SA Scoping report. The CS10 revision /changes currently are not even properly referenced nor track changed within the SASR. Equally, there is no reference or evaluation as to whether an SPD status document was/is a suitable vehicle to take these proposals forward to a proper sustainable conclusion. This therefore does not follow best practice guidance issued by the Chief Planner and DCLG in 2012. The verbal claim by IBC officers that changes and revision to policy CS10 within the CSFR were deemed necessary to prevent the risk of unfettered development via early planning applications before the due processes were completed is as yet, an untested and unevaluated opinion. It should be a proposal that is referenced and explored within this scoping document. If planning consents by legal challenge was deemed to be a risk, references should be made to the guidance 2012 from DCLG 6 and an evaluation of the relative risks incorporated within the SA SR.	It is not the role of the Scoping Report to list the policies. The Scoping Report sets the framework for the appraisal of policies.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
				N/A	<p>SOCS have always pragmatically supported a jobs-led / employment - led Local Plan and Core Strategy. This is deemed as a proportionate, balanced and sensible approach which would engender much public support. However, the public cannot and will not support a skewed and unsustainable homes led policy approach which they consider to be unsound. The public look to Spain, Ireland and Portugal who have learnt this fundamental fact to their cost. The public feel attempting to build your way out of recession is not going to work, especially in Ipswich. Yes, IBC have repeatedly consulted the public but have repeatedly failed to listen and respond to the public's majority common sense view. As Russell Williams CEO stated at the IBC Examination in public 2011, the danger is of the tail wagging the dog; with Central Government and business landowner /developer pressure taking precedence over the public's expressed views and wishes for the town. SOCS key concern is that if this development were to be allowed to proceed in it's current form, the long term success of the proposals are questionable, and likely to be unsustainable on viability and deliverability grounds -due to insufficient profits being generated to reliably deliver the necessary infrastructure and mitigation, together with sufficient resources being reliably available for medium and long term maintenance obligations generated by the sites needs. The Environment Agency already is looking to local resolution and mitigation by neighbourhood voluntary groups to address the likely shortfall of resources. The new prospective home owners may balk at the imposition of a long term maintenance levy applied in perpetuity for services which are to be accessed and enjoyed by the whole of the Ipswich population and the IPA.</p>	<p>Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.</p>

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Save our Country Spaces	General comment - omission	No mention is made in this Scoping report, nor in earlier iterations by Hyder of the long standing requirement to mitigate for the pressures inter authority on the RAMSAR sites, Deben and Orwell as per their joint SA/SEA commitment agreed with Suffolk Coastal District Council and further strengthened by legal challenge by Suffolk Wildlife Trusts evaluation on impacts.	An Appropriate Assessment is being carried out and it will be referenced in the final Sustainability Report.
			Save our Country Spaces	General comment - alternatives	Where is the Plan B or alternatives referenced? Where is there evidence of wiggle room; where is an evaluation of what will happen if one or more landowners/developers face either logistical difficulties (unforeseen or in the natural course of events) or financial difficulties, or both?	This comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report, however the consideration of reasonable alternatives for the Core Strategy Focused Review and Site Allocations DPD will take place at the next stage in the SA process.
			Save our Country Spaces	N/A	What are the contingency measures proposed if, having started development, (especially with the prospect of multiple starts), a default situation arises or Central government yet again moves the goal posts on anticipated Section 106 or CIL infrastructure funding. This may allow the impact of viability considerations to override local identified needs? This may lead to non delivery of vital infrastructure and render the development unsustainable.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	N/A	Where is the independent market surveillance and anecdotal, but valuable evidence to halt matters if unsustainable development ensues and the need arises? What efficacy does the IBC AMR have to directly influence the phasing and rate of development and halt it if necessary? Should not this be given equal weight and material consideration within the Courts if there is a developer landowner challenge?	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Save our Country Spaces	General Comment	Where is the empirical evidence that IBC is paying due attention and heeding National Plans and Programmes cited in the Hyder Scoping Report (such as one of the most important documents reviewed) namely the Sustainable Development Strategy which outlines the overarching Government objective to raise the quality of life in our communities?	One of the tests of soundness is that a plan is justified, which means it should be based on proportionate evidence.
			Save our Country Spaces	Appendix B	Raising the quality of life in our communities is vital considering the identified problems highlighted within IBC AMR and in the current difficult climate of economic problems facing Ipswich, many of which are effectively beyond their capacity to control; re Traffic /congestion/ pollution, educational underachievement, (all SCC) unemployment rates economic inactivity- (Local Business & market forces) - inaccurately portrayed within the Hyder document as below national averages but are they not higher in Ipswich? - urban cramming and resultant deprivation, and difficulties experienced with lack of social housing and inadequate health and social care service delivery (SCC CCGs and Central Government). Effectively the Borough only has control over urban cramming (and resultant deprivation), and difficulties experienced with lack of social housing - both areas which they also appear to have limited control over due to developer and landowner pressure under the steer of the current Central Government Build at All cost/ Build at Any Cost Agenda! The revision CS10 and Focused Review of the Core Strategy reflects that central dilemma. SOCS recognise this is a difficult place to be.	Quality of life is picked up in sustainability objective HW2.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Save our Country Spaces	General comment - omission	Environmental constraints such as the recent 50% cut in direct government funding to the Environment Agency for flood re-mediation and maintenance will have a significant impact on sustainability and need to be explored within the SA/SEA.	Flooding issues are picked up in sustainability objective ET7. The Ipswich flood defences are due for completion in 2018.
			Save our Country Spaces	General Comment - omission	Equally important bearing in mind Ipswich's BC obligations on formal AQMA problems is the referencing of the recent DEFRA consultation which ended September 2013 and IBC's responses to it in the light of their identified and ever growing air quality problems which will be further impacted by the NF proposals. This should be covered within this report. There is a need therefore to reinvigorate and refocus LAQM on action to help the UK meet EU air quality standards and to clarify its role alongside other actions to improve air quality (by national government etc) and to highlight what local authorities can do through working together to improve air quality. Failure to incorporate, reference and evaluate this important information, which has been identified as one of the key environmental issues and constraints on the NF proposals, weakens and devalues the purpose of this Scoping report. SOCS would suggest if IBC's specialist Public Health and Air Quality Management / Climate Change Officers have not been formally invited to contribute to this Scoping exercise, this is tantamount to negligence.	Air quality is picked up in sustainability objective ET1.
			Save our Country Spaces	General Comment	SOCS sign up to the NFPG Comments also (see above). Those where SOCS add further comments are listed below with SOCS' additions shown in italics.	N/A

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Save our Country Spaces	General Comment	<p>We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed.</p> <p><i>It may also be unnecessary as just as IBC jobs target deficit was addressed at inspection by alternative arrangements to met the jobs quota from the Ipswich Policy Area IPA so likewise can the housing targets under Duty to Cooperate and Localism.</i></p>	The revised strategy set out in Core Strategy Focused Review combines a focus on development delivery with an approach which is policy compliant to the National Planning Policy Framework.
			Save our Country Spaces	General Comment	<p>Clearly sustainability is not just about building sufficient homes to meet anticipated demand but about wider social and environmental issues. The implications of a larger local workforce competing for a relatively smaller number of jobs, for example on average salary levels which have already fallen substantially in Ipswich, need to be fully considered in the new SA. Lower average salary levels will inevitably result in higher levels of deprivation and poverty with associated health implications especially in relation to increased fuel poverty.</p> <p><i>This is particularly relevant to IBC as it is essentially a relatively low waged economy, compared to other local LAs, with comparatively young demographic.</i></p>	The Council has prepared a topic paper on population and household projections and this considers the alternative strategies available to the Council including whether they are policy compliant and realistic in market and deliverability terms. It does not necessarily follow that a larger local workforce will be competing for a smaller number of jobs. For example, some of the population and household growth will be accounted for by people over the retirement age; some residents can travel to jobs using sustainable modes e.g. at Felixstowe, BT Martlesham or London; and at the 2001 census there was net travel to work into Ipswich.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Save our Country Spaces	General Comment	<p>The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the new SA. This can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work.</p> <p><i>Fit for the 21st century solutions are already causing problems at Civic Drive, where removal of a perfectly serviceable roundabout appears to be further exacerbating congestion and pollution. A review of SCC transport solutions for Tuddenham Road and Westerfield will be required to address these unsustainable transport solutions.</i></p>	See above.
			Save our Country Spaces	General Comment	<p>The new SA must assess and compare the sustainability benefits of a realistic jobs-led CS to a housing-led strategy. This needs to include relative assessments of a co-operative approach between Ipswich Borough and neighbouring authorities where new homes are built near to the location of new jobs across. Such an approach is required under the NPPF requirement for local authorities to cooperate.</p> <p><i>The Actions under Duty to Cooperate issued by DCLG in 2012 requires a statement of actions by IBC. The regulations also require you to report to your communities on the actions you have undertaken under the Duty to Cooperate. In addition to the transparency benefits this brings, it will be beneficial when it comes to showing compliance with the Duty to Cooperate at examination on any forthcoming Local Plans, either yours or ones you have an interest in.</i></p>	Refer to NPPF requirement to meet objectively assessed housing need. The Ipswich SHMA looked at the whole housing market area (Ipswich, Mid Suffolk, Babergh, Suffolk Coastal).

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
			Save our Country Spaces	General Comment	In particular, the SA needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sroughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the NF with residents commuting through Ipswich to access employment sites. <i>SOCS are pleased there is recognition within the Executive report 26th November that acknowledges this requirement and states suitable alternatives will be explored at SA of the CSFR.</i>	Sugar Beet Factory site is outside IBC's control. Babergh Core Strategy identifies it for employment to meet job needs. People living there would still need to travel through Ipswich to job opportunities. Plan has to be realistic - in terms of Coastal and Babergh which have just completed Core Strategy processes and market delivery of housing on brownfield sites.
			Save our Country Spaces	General Comment	The current CS allows for a phased approach for the development of the NF and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire NF without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full critique of the rationale behind the proposed changes. <i>The suggested possibility of a multi start approach, whilst appearing to easy delivery of infrastructure may also pose the risk if one or more developer / landowner hits financial or other problems. As stated earlier in SOCS response, what contingency is there within the proposals if to market forces or other difficulties impact on infrastructure delivery, the added burden which may fall on remaining landowners / developers, thereby making their operation unviable and halting their delivery? The land having been committed, will be blighted for years with little sound chance of resolution as happened locally at the Ipswich Dock/Waterfront and in Ireland. This is a fundamentally unsustainable situation. A safety net fund needs to be arranged and established as mitigation, -reserve matters? - or perhaps Grampian Conditions with front loaded finance ahead of any planning permission being granted and started. Grampian Conditions are not referenced or</i>	See above.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
					<i>mentioned within the Hyder Scoping report.</i>	
			Save our Country Spaces	3.4.1.3	<p>Paragraph 3.4.1.3 Ipswich Central's vision for Ipswich needs to be considered http://ipswichcentral.com/thebigdebate/ along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that 'St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared.'</p> <p><i>Or substantive changes, additional AQMA or enlargement made to existing AQMA which are being impacted by NF proposals.</i></p>	The additional AQMAs have not yet been declared - boundaries are being considered.
			Save our Country Spaces	4.1	<p>As the revised CS proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough.</p> <p><i>Any update on out of date SCC Survey data?</i></p>	This is not a job for the SA and would be considered through transport modelling once 2011 Census Travel To Work data has been published.

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
8	Katharine	Fletcher	English Heritage	General comment / Appendix B Baseline Data / Table 3-3 ET9	The draft report is lacking in detail at this stage in relation to the historic environment. We would request that further consideration is given to how can be strengthened.	The detailed assessment will be undertaken at the next stage.
				General comment	With regard to the scope of the policies to be appraised, we note that this is a focused review, particularly relating to the delivery of housing and employment. Notwithstanding this, we would recommend that the implications of the National Planning Policy Framework (NPPF) in relation to other, generic, policies should be considered. The NPPF identifies the historic environment as a key dimension of sustainable development in para 7, and it is included within the core planning principles in para 17. We would wish the local plan allocations, and general policies, to take account of the contribution that the historic environment makes to sustainable development at both a strategic and detailed level.	<p>The Scoping Report picks up historic environment matters under sustainability objective ET9 and in the baseline data at Appendix B B10. The Core Strategy Focused Review also proposes minor amendments to policies including those on historic environment to reflect the NPPF. A detailed consideration of the impact of the NPPF on the adopted Core Strategy was considered by the Council's Executive Committee on 14th August 2012</p> <p>https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy_-_Appendix.pdf</p> <p>https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy.pdf</p>

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
				General comment / Appendix B Baseline Data	A further requirement of the NPPF is that local plans should set out a positive strategy for the historic environment (para 126). In relation to this, it will be essential to ensure that there is a solid foundation in the SA/SEA relating to the evidence base for the historic environment, and the issues and trends that are evident in the local plan area that can potentially be influenced by the plan. To enable the SA/SEA to play its full part, it may be helpful to prepare a brief topic paper for the historic environment, bringing together the baseline data and the relevant issues. English Heritage has published guidance in relation to SA/SEA and the historic environment, which is available on the Historic Environment Local Management (HELM) website. This refers to a range of data sets that can be publically accessed. The document also includes recommendations relating to potential indicators.	<p>The assessment takes into consideration the protection and conservation of the historic environment by assessing the potential effects of the plan with regards to following objectives: ET9 <i>To conserve and enhance the historic environment, heritage assets and their settings</i> and ET10 <i>To conserve and enhance the quality and local distinctiveness of landscapes and townscape</i>s.</p> <p>The revised policies are not directly related to conservation of the historic environment, other policies previously assessed address this topic.</p>
				Table 3-3 ET9	<p>We note in the report that you refer to heritage assets at risk, and this an issue underlined in para 126 of the NPPF. In order to ensure that the SA/SEA report is up to date, we recommend that you refer to the latest information in English Heritage's 2013 register, which is available on our website:</p> <p>http://www.english-heritage.org.uk/publications/har-2013-registers/</p>	The latest register will be used during the assessment of potential effects. (Heritage at risk register 2013, East of England).

Comments on Core Strategy Interim Sustainability Appraisal Report (December 2013)

Summary of Response	Respondent	Council's comments	Action required
Largely in agreement with the findings of the sustainability appraisal report and have no specific or general comments to make.	Environment Agency	Noted	None
The National Planning Policy Framework states that broad locations can be identified for development late in the plan period, but the broad location of 'Ipswich Policy Area' (IPA) provides no clarity as to the proportion of dwellings expected to be provided in each neighbouring authority. The sustainability appraisal (SA) does not provide any assessment of broad locations or cumulative effects on areas with known constraints. In light of the limited land available in Ipswich the SA should consider all reasonable alternatives e.g. increasing densities, and consider the plans already adopted by neighbouring authorities and developments in the IPA already established in principle.	Suffolk Coastal District Council	It is agreed that the Sustainability Appraisal should consider the potential effects of the longer term policy of working with neighbouring authorities however at this stage it is not possible/appropriate to identify broad locations outside Ipswich Borough as the plan relates to Ipswich Borough only. Whilst higher densities are understood to be unviable at this point in time, there may be scope to develop higher density development in the Borough in the future and therefore this could be considered as a strategic alternative. Developments occurring/allocated in the IPA area outside Ipswich at the moment could not be counted against both the Ipswich housing need and the housing need of neighbouring authorities.	The Sustainability Appraisal has been revisited in order to consider the effects of working with neighbouring authorities to meet housing need later in the plan period and to consider the strategic alternative of higher density development within Ipswich.
Would advise that reference is made to the requirement for a Habitats Regulation Assessment to assess proposals on Ramsar sites. The SA should adopt a topic based approach in assessing the effects of the plan on the environment and locally designated sites such as County Wildlife Sites. Connections between topics should be considered. The report should reference Suffolk Biodiversity Action Plan, local Green Infrastructure Plan, Natural England's 'standards for accessible natural greenspace' (ANGst), and Analysis of Accessible Natural Greenspace	Private individual	It is agreed that the requirements for HRA should be within the policies. It is also agreed that further detail should be included in DM31 in relation to the categories of designated sites.	Policy DM31 has been amended to refer to the requirements of the Habitats Directive and to contain specific policy for different designated sites.

Summary of Response	Respondent	Council's comments	Action required
Provision for Suffolk, the local Water Cycle Study and Sustainable Drainage Systems (SuDS).			
Additional text on open spaces, green infrastructure, improved ecological networks and tree canopy cover are supported (Para. 4.2.1).	Northern Fringe Protection Group	Noted	None
SA fails to see the implications of changes to the Core Strategy; the removal of any Previously Developed Land target is a major change. Development of the greenfield Garden Suburb will reduce development of brownfield sites which should be a priority. A suburb creates more traffic than sites near to existing employment and will therefore impact upon environmental objectives. A specific target for jobs in Ipswich not the Policy Area is also required in order to have any meaning. The implications in switching from a jobs led to a housing led strategy are huge and must be assessed.	Northern Fringe Protection Group	<p>Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to the Policy CS9.</p> <p>Policy CS13 relates to the creation of in the region of 12,500 jobs in Ipswich Borough.</p> <p>The 2013 Sustainability Appraisal (reference above) has considered the changes between adopted CS13 and the proposed revisions to CS13.</p>	None
The Sustainability Appraisal / Strategic Environmental Assessment process requires an examination of the baseline information of the Borough as it is now together with data on how it may change in the future. The Core Strategy and SA must therefore be based on the best data available, which is not the case as it fails to utilise the most recent DCLG or East of England Forecasting Model 2013 forecasts.	Northern Fringe Protection Group	The SA baseline, set out in the Scoping Report, identifies the current situation whereas the East of England Forecasting projects future jobs growth which has informed policy CS13. The assessment of adopted policies represents the assessment of likely direction of change without the review of the plan (i.e. the 'no plan' alternative), as detailed in Section 3 and Appendix E of the 2013 Interim SA Report.	None

Summary of Response	Respondent	Council's comments	Action required
SA must take account of new governmental guidance on the National Planning Policy Framework issued following the Ministerial Statement of 6 th March 2014. Changes include: issuing guidance on flood risk; clarifying that local plans can be sound where authorities cannot identify housing land for years 11-15; allowing windfalls to be counted over the whole plan period and student/older persons' housing and the reuse of empty homes to be included when assessing housing need; ensuring that infrastructure is provided to support new development; stressing the re-use of brownfield land; and clarifying the issue of prematurity in relation to draft plans.	Northern Fringe Protection Group	The review of plans and programmes relates to adopted policy. The National Planning Policy Guidance contains details relating to the implementation of the National Planning Policy Framework, the policies of which are referred to in the Scoping Report, and it is therefore not necessary to specifically refer to this. The National Planning Policy Guidance has however been considered when revising the two DPDs.	None
Sections 2.3.9 and 2.3.12 fail to identify from the 2013 Suffolk Growth Strategy (sections 2.26, 4.2, 4.4 & 4.5 refer) the need to 'transform skills from a growth barrier to a growth stimulus' and 'Boost educational attainment, aspiration and employability'.	Northern Fringe Protection Group	The Suffolk Growth Strategy is identified in the Review of Plans, Policies and Programmes in the Scoping Report (2013). It is not necessary to refer to every relevant Plan within this section of the Sustainability Report which essentially summarises the process undertaken in the Scoping Report.	None
Table 2.2: omissions in the summary of sustainability issues and opportunities that need to be corrected, especially in relation to the use of obsolete data. E.g. needs to better represent low education standards in Ipswich; use better health data; address wastewater issues; acknowledge that air quality is worsening in Ipswich and factor in the effect of traffic from the Northern Fringe; acknowledge that Ipswich is not well connected; use better data on pay/benefits; address	Northern Fringe Protection Group	The baseline issues refer to current issues and not those that may arise from policies contained within the plan which are identified through the assessment itself (see chapters 3 and 4). Further assessment of air quality effects arising from development at the Northern Fringe will be addressed. It is not clear what 'better data' is available. Table 2.2 identifies that educational attainment is low and identifies issues around Source Protection Zones in relation to water. Deprivation relates to a wide range of topics which	Anglian Water's Water Resources Management Plan 2015 (published 2014) has been referred to in the PPP review of the SA Report.

Summary of Response	Respondent	Council's comments	Action required
worsening deprivation; and include empty homes and stock condition data.		<p>have been covered in detail in the Scoping Report and in Table 2.2. Do not agree that Ipswich is not well connected. However the Scoping Report does not identify the water supply issues set out in the recently published Water Resources Management Plan.</p> <p>Revisions to the baseline identify the possible future revisions to AQMAs.</p>	
Table 2.3: suggest improvements to objectives and indicators, e.g. ET1 should include an indicator to measure congestion as the main cause of air pollution. Consider consequent changes to Table 2.4.	Northern Fringe Protection Group	It is not clear how congestion would be measured. In relation to air quality congestion is an 'output' whereas the indicators proposed would actually measure the 'outcome' and are therefore more meaningful.	None
Para. 2.3.27: there will obviously be an increase of traffic during the construction / operation of new residential developments associated with an increase of inhabitants and their future transport requirements, affecting local air quality and climate change. This paragraph needs to be amended or justification why there might be no increase in traffic.	Northern Fringe Protection Group	It is agreed that there is likely to be an increase in traffic and the paragraph should be reworded in this respect.	This has been picked up in the SA.
Para. 2.3.25: question the 'uncertainties' arguing they are likely outcomes unless further mitigation steps are implemented. The SA underestimates the impact of objective ER3 which is incompatible with objectives ET1, ET2, ET3, ET4, ET6, ET7 and ET8.	Northern Fringe Protection Group	Paragraph 2.3.26 identifies the reasons for uncertainties however the Sustainability Appraisal process identifies mitigation measures to help to address these, as set out in Appendices E and F of the Sustainability Appraisal Report.	None
Para. 2.3.35: a number of concerns from previous comments on the Scoping Report have not been	Northern Fringe Protection Group	. See below	See below

Summary of Response	Respondent	Council's comments	Action required
adequately addressed and need to be revisited as set out below:			
<p>Scoping Rpt comment: The NFPG has always supported an employment-led strategy. However, we argued that IBC's Core Strategy (CS) was not sustainable and therefore unsound as it was based on job targets that had no supporting evidence base and were clearly unrealistic and unachievable. The previous SA failed to recognise these legitimate and material concerns and omitted any form of assessment of the implications of the jobs target being unrealistic. Evidence now shows that the jobs target was indeed unsustainable and that the original SA was incorrect in assessing the CS as sustainable. This clearly shows that a more robust and evidence-based approach for the SA is required that better takes account of the views of the general public which have been shown to be informed and accurate.</p> <p>Further comment: Why has Hyder ignored the point we are making in its response? The UK recession started in Q2 2008 and was known at the time of Hyder's SA so it was obvious that delivery was not possible. This does not change the fact that the forecasts were not evidence based and were ludicrously over-optimistic when compared to historic trends. Please explain why Hyder failed to identify these obvious data flaws in its original SA?</p>	Northern Fringe Protection Group	As stated in response to the comment on the Scoping Report, the employment targets are based on the East of England Forecasting Model which is widely used. It is unclear from the response what evidence would lead to the SA assessing the policies differently.	None
Scoping Rpt comment: We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done	Northern Fringe Protection Group	The objectively assessed housing needs arises from the Ipswich Housing Market Area Strategic Housing Market Assessment (SHMA) (August 2012) and Ipswich Housing Market Area	None

Summary of Response	Respondent	Council's comments	Action required
<p>without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed.</p> <p>Further comment: The approach is not policy compliant with the NPPF and guidelines as it does not use DCLG 2011 forecasts and is based on an old EEFM 2012 model run rather than EEFM 2013. The revised strategy fails to take account of a large fall in economic migration and a massive drop in net commuting into Ipswich. It proposes an increase in housing that is not supported by a balanced increase in jobs. It does not contain a specific jobs target and over-estimates the growth prospects of the town centre when compared to the Suffolk Growth Strategy and NALP strategic plan. How does Hyder intend to factor these points in its SA?</p>		<p>population and household projections: an analysis of demographic change (September 2013).</p> <p>The SA objectives are based on an analysis of all relevant plans and programmes including those referred to.</p>	
<p>Scoping Report comment: The SA needs to consider the implications of this key change in IBC's strategy and in particular consider the implications of new homes being constructed in Ipswich Borough that will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Previously one of the main arguments that the Northern Fringe housing development is sustainable was that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. The SA of the Northern</p>	Northern Fringe Protection Group	<p>As stated previously, it does not necessarily follow that a larger workforce would be competing for a smaller number of jobs. Policies would ensure that offices and other town centre uses are focused on the town centre (see policy CS14). The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) contains specific requirements in relation to public transport and it should therefore not be assumed that only existing patterns of bus provision would be available. It is not the role of the Sustainability Appraisal to identify specific measures to mitigate possible effects but to ensure there are the correct policies in place to secure these measures at the</p>	None

Summary of Response	Respondent	Council's comments	Action required
<p>Fringe will also need to be revised to take account of this.</p> <p>Further comments: Why has Hyder chosen to ignore that the net commute into Ipswich is falling from 11.8 (000's 2001) to 1.1 (2012 based on 2011 employee and 2011 resident employment data)? How will Hyder take this into account in its SA?</p> <p>Please explain how Hyder considers the Ipswich – Felixstowe train service as a sustainable travel option when there is evidence that it is clearly failing and as the train station is not located near to the major sites of employment? We are pleased to note that Hyder recommends that improved train services from Westerfield station are required.</p> <p>Currently, the Route 66 service takes 48 minutes from Ipswich train station to Martlesham. For someone travelling from the Northern Fringe it will take between 20-30 minutes to access this service (assuming that the proposed bus route servicing the Northern Fringe arrives at the Cattle Market bus station, which Route 66 serves the station and not Tower Ramparts bus station). It will therefore take around 75-80 minutes to get from the Northern Fringe by public transport to Martlesham Heath which is less than 7 miles away.</p> <p>Why does Hyder think this will be a sustainable transport route that will be used by residents of the Northern Fringe? This would only work if there was a direct bus route from the Northern Fringe to Adastral Park. We are pleased to note that Hyder recommends that bus services from the Northern Fringe to employment sites are required but Hyder needs to add</p>		<p>planning application stage which in relation to transport would be through DM17. The SA has been based on the published data available as outlined in the Scoping Report.</p>	

Summary of Response	Respondent	Council's comments	Action required
<p>that these should be direct otherwise few people would use them.</p> <p>Why has Hyder chosen to ignore that IBC's forecasts show that there will be more working age people in the Borough competing for less jobs in its answer?</p> <p>Hyder shows a major lack of understanding of the transport issues facing Ipswich. Please advise how Hyder has attempted to gain first hand experience of these issues and incorporate this knowledge into its SA. Without having this knowledge Hyder's SA risks being unsound. How does Hyder intend to fill this apparent knowledge gap? We would be pleased to meet with Hyder to share our concerns and first hand experience.</p>			
<p>Scoping Report comment: We support Paragraphs 2.20 and 2.21 of the IBC Executive paper REF NO: E/13/60 Northern Fringe - Draft Supplementary Planning Document Ipswich Garden Suburb and Sustainability Appraisal confirming that the Core Strategy Focused Review (CSFR) "will look at alternatives to the Northern Fringe allocation itself". The Scoping study must include details of how this will be carried out. This should include a "mapping" of the proposed sites of major employment and new homes in and around Ipswich and analysis of the potential impact and sustainability of likely travel routes. The process should also include an assessment of whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable.</p>	Northern Fringe Protection Group	<p>Consideration has been to given to only allocating 1,500 dwellings at the Garden Suburb however this is judged to be unrealistic, see paragraph 3.3.1 of the SA report for the Proposed Submission Core Strategy.</p> <p>It should not be assumed that those occupying new homes would only work in 'new' jobs, the SA must also give consideration to the location of existing jobs.</p> <p>The SA objectives are based on the baseline and review of plans and programmes contained in the Scoping Report.</p>	No action needed.

Summary of Response	Respondent	Council's comments	Action required
<p>Further comments: Why does Hyder not identify that for the Ipswich Housing Market Area it is more sustainable to locate new homes near to the sites of new jobs and that this option is available under the duty to cooperate and should therefore be considered?</p> <p>How will Hyder assess whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable? If Hyder simply assumes IBC's figures are correct then its SA risks being unsound.</p>			
<p>Scoping report comments: The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the SA of the CSFR and in considering alternatives to the Northern Fringe allocation itself. Clearly this can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the Northern Fringe will pass through AQMAs and areas of pollution concern as residents travel to work.</p> <p>Further comments: Hyder does not yet fully assess the implications of each policy with regards to travel through ET4 and ET1 as Hyder assumes that new residents will either commute to new jobs in Ipswich town centre rather than the likely sites of new employment or use sustainable transport which is not a viable proposition for residents from most proposed</p>	Northern Fringe Protection Group	<p>Whilst further reference to possible impacts on AQMAs could be provided, it is not the role of the SA to undertake a full and detailed traffic impact assessment which would be undertaken at planning application stage. The SA does not assume that every resident would travel to new jobs in the town centre, however it considers the location of the Garden Suburb in relation to the town centre where there is a concentration of jobs. It should not be assumed that residents of the new homes would only work in 'new' jobs,</p>	<p>Further consideration has been given to the impact on AQMAs in the assessment of CS10.</p>

Summary of Response	Respondent	Council's comments	Action required
new homes outside the town centre. Hyder also refuses to acknowledge that Air quality is worsening in Ipswich requiring new AQMAs and that residents will want and/or/need to drive through the current and proposed AQMAs. How will Hyder take these points into account to ensure its SA is sound?			
<p>Scoping Report comments: In particular, the SA of the CSFR needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sroughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the Northern Fringe with residents commuting through Ipswich to access employment sites. The impact of utilising sites such as Grafton Rd, Cox Lane and Westgate for a larger number of new homes, rather than leaving them vacant, needs to be appraised.</p> <p>Further comments: Can Hyder explain, its assumption that people living on the Sugar Beet Site would need to travel through Ipswich to access employment sites? It is far more likely the majority would take advantage of the excellent access to the A14 and onwards. Of course there are existing employment sites nearby plus new ones that could be developed on the Sugar Beet site as a shared residential/employment site as well? IBC's housing growth target of at least 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring Local Authorities to make up the shortfall of 4,611 dwellings 11</p>	Northern Fringe Protection Group	<p>Consideration has been to given to only allocating 1,500 dwellings at the Garden Suburb however this is judged to be unrealistic, see paragraph 3.3.1 of the SA report for the Proposed Submission Core Strategy.</p> <p>It should not be assumed that those occupying new homes would only work in 'new' jobs, the SA must also give consideration to the location of existing jobs.</p> <p>The plan allocates land at Westgate and Cox Lane for a mix of uses including residential. The site at Grafton Way is now proposed for housing allocation should the extant permission for a mix of uses not be implemented.</p> <p>It is reasonable to assume that, should the sugar beet factory site be developed for housing, then a proportion of residents would travel into Ipswich for employment. CS7 identifies a need to work with adjoining authorities later in the plan period to meet the residual housing need however this plan cannot itself allocate land within another authority's area. Mechanisms are in place for this</p>	Consideration has been given to relying on neighbouring authorities and only allocating 1,500 dwellings at the Garden Suburb.

Summary of Response	Respondent	Council's comments	Action required
(Paragraph 8.83 of the Core Strategy). So such sites as the Sugar Beet factory must be considered to help IBC deliver its targets. Hyder's comment that it cannot as IBC has no control over it implies that the CS is unsound as IBC has no control over delivering its housing target. Can Hyder confirm this or whether it will be assessing such options which are possible under the duty to cooperate? Suffolk Coastal is planning on building new homes to match new jobs created at Adastral yet Hyder in its previous response believes it is acceptable for IBC to also build new homes in the Borough for people to commute to Adastral. Hyder needs to be consistent in its process and appraisal.		joint work to take place as detailed in the Duty to Cooperate statement.	
Scoping Report comments: The current CS allows for a phased approach for the development of the Northern Fringe and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire Northern Fringe without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full assessment of the rationale behind the proposed changes. This should include analysis of the comparative risks of unfinished sites and/or stalled developments being left on the Northern Fringe for whatever reason. This is already a major problem for Ipswich in relation to the waterfront developments, as a result of the unsustainable multi-starts that were allowed to commence and become a major blight on Ipswich.	Northern Fringe Protection Group	<p>The SA has considered the allocation as proposed in the level of detail which is proportionate to the purpose of the SA.</p> <p>A separate SA was undertaken on the SPD and the SPD is identified as mitigation in a number of respects however it would not be appropriate or necessary for CS10 to reiterate the guidance contained in the SPD.</p>	None

Summary of Response	Respondent	Council's comments	Action required
Further comments: Hyder's appraisal of revised policy CS10 does not fully consider the implications of multiple starts compared to the original CS10 as we detail in our response to the CS and Northern Fringe SPD consultations. As a minimum the proposals contained in the Northern Fringe SPD must be reflected in the CS and there should be further restrictions to avoid stalled developments and to ensure the required infrastructure delivery relative to the number of homes, especially in relation to the first primary school. Will Hyder reappraise this in light of our comments?			
<p>Scoping Report comments: Paragraph 3.2.1 needs to reference the proposal for the Core Strategy to no longer be jobs-led but a housing-led strategy. The SA must compare and assess the relative benefits of these alternative strategic approaches and alternatives to the Northern Fringe allocation itself as committed to by IBC in the recently approved Executive paper REF NO: E/13/60.</p> <p>The paragraph still needs to reference this fundamental change though. Why is Hyder not recommending that IBC uses the DCLG 2011 forecasts to assess housing need as referenced in the NPPF guidance and the most recent EEFM forecasts? These are obviously required for an up to date assessment otherwise the CS risks being unsound.</p> <p>Further comments: Hyder states that for "employment local and regional strategies aim to play to the area's sectoral strengths." Why has Hyder not identified that Ipswich town centre has not been identified as a major</p>	Northern Fringe Protection Group	<p>Consideration has been to given to only allocating 1,500 dwellings at the Garden Suburb however this is judged to be unrealistic, see paragraph 3.3.1 of the SA report for the Proposed Submission Core Strategy.</p> <p>Paragraph 8.137 of the Core Strategy identifies the sectors identified for growth in the NALEP.</p>	Consideration has been given to relying on neighbouring authorities and only allocating 1,500 dwellings at the Garden Suburb.

Summary of Response	Respondent	Council's comments	Action required
centre for new jobs in the Suffolk Growth Strategy or the NALEP Strategic Plan and that there is a mismatch between their employment growth sectors and those identified for Ipswich?			
<p>Scoping Report comments: Paragraphs 3.3.2 and 3.3.11 and Table 3-1 need to specifically reference the CSs of neighbouring authorities and the critical work of the Ipswich Policy Area Board given the duty to cooperate and the proposed approach to build homes in Ipswich Borough for people working outside the Borough. These are more important than the New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013, which is more of a wish list than an evidence-based document. The quoted growth forecasts are out of date.</p> <p>Further comments: Will Hyder include in Table 3-1 the Ipswich Policy Area Board's work, provide updated forecasts and include the recently released NALEP Strategic Plan which has more substance as these are all more relevant. If not, please explain why.</p>	Northern Fringe Protection Group	The review of plans and programmes (see Appendix A of Proposed Submission Core Strategy SA report) includes the NALEP plan and the Suffolk Growth Strategy. Table 3-1 is informed by these. The review of plans and programmes has also considered the adopted plans of adjoining planning authorities. The work of the Ipswich Policy Area Board is committed to through policy CS6 which has been subject to SA but, as a mechanism for joint working, it is not clear how this would be relevant to Table 3-1.	None
<p>Scoping report comments: Table 3-1 should refer to Ipswich Borough-specific data rather than quoting East of England data and should reference the most recent data e.g. the EEFM August 2013 modelling. This projects a lower level of jobs than previously.</p> <p>2011 2031 Increase</p> <p>Population 133.7k 163.4k 29.7k (22.21%)</p> <p>Resident jobs 63.2k 71.4k 8.2k (12.97%)</p>	Northern Fringe Protection Group	The review of plans and programmes has been updated to include reference to the up to date forecasts available at the time of writing. The 2013 forecasts were not significantly different to the 2012 forecasts.	None

Summary of Response	Respondent	Council's comments	Action required
<p>This means that additional residents will either have to commute outside of Ipswich Borough to find work or will be unemployed; neither of which is sustainable.</p> <p>Further comments: We are pleased that Hyder will take into account Aug 2013 modelling results but note that it has not yet done so. Hyder should therefore insist that IBC uses most recent data in its analysis otherwise the CS will be unsound. Please confirm this will be the case. If not please explain why Hyder believe it is acceptable to use out of date data.</p>			
<p>Scoping Report comment: Paragraph 3.4.1.3 Ipswich Central's vision for Ipswich needs to be considered http://ipswichcentral.com/thebigdebate/ along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that "St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared. "</p> <p>Please confirm that Ipswich Central's vision for Ipswich will be considered by Hyder in the SA. If not, please explain why?</p> <p>Further comments: Please confirm that the impact of the revised CS on the additional AQMAs will be considered in Hyder's SA. If not, please explain why? The approximate sites of the AQMAs are known so there is no reason why they should not be considered.</p>	Northern Fringe Protection Group	<p>The vision for Ipswich Central can be included in the review of plans and programmed.</p> <p>The potential impact on AQMAs has been considered in relation to policy CS10.</p>	This has been included within the review of plans and programmes,

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<p>Table 3-2 needs to reference the proposed new AQMAs (as does Appendix B.7) as referenced above and utilise more recent data where available. There are also opportunities to improve cross-town transport infrastructure and access to the A14/A12. This will become a fundamental requirement if the CS is changed to housing-led as residents will need to be able to easily commute to employment sites outside the Borough.</p> <p>The fact that new AQMAs are proposed still needs to be referenced here. Please explain why Hyder continues to ignore this worsening environmental issue in its report.</p> <p>Please confirm that Hyder's SA will consider the additional cross-town transport infrastructure and improved access to the A14/A12 that will be required to mitigate the impact of the change in strategy to a housing led one? If not, please explain why?</p>	Northern Fringe Protection Group	<p>The baseline (Appendix B of the Proposed Submission Core Strategy SA report) has been updated to reflect the current situation surrounding AQMAs.</p> <p>Mitigation measures have been identified in relation to transport where necessary throughout the assessment.</p>	None
<p>Scoping Report comments: Paragraph 4.1 As the CSFR proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough.</p> <p>Further comments: As mentioned earlier, the EEFM 2013 shows that the net commute into Ipswich is falling from 11.8 (000's 2001) to 1.1 (2012 based on 2011 employee and 2011 resident employment data)? With the proposed shift to a housing-led strategy and lack of new jobs being created in the town centre, residents will have to increasingly commute to jobs</p>	Northern Fringe Protection Group	The SA has considered the relationship between new housing in terms of both the location of new jobs and the location of existing ones, through SA objective ET4.	None

Summary of Response	Respondent	Council's comments	Action required
outside Ipswich Borough. This is obviously a major sustainability issue that must be considered fully in the SA. How will Hyder take this into account in its SA?			
<p>Need to make clear that the proposed CSFR is no longer a jobs-led strategy but a housing-led strategy. To fail to mention this fundamental change is misleading and lacks transparency. Likewise the major proposed changes to CS10 need to be outlined here i.e. the intention to allow simultaneous multiple starts across all three areas of the NF without restricting the number of construction sites at any one time etc and prior to the agreement of a Masterplan also needs to be specifically mentioned.</p> <p>As these are major changes they should still be referenced here. If not, why not?</p>	Northern Fringe Protection Group	The geographical scope of the SA which has not changed. The SA assesses the policies as they are presented in the Proposed Submission Core Strategy. Section 4.3 of the SA report of the Proposed Submission Core Strategy identifies the main changes since the earlier draft.	None
<p>Scoping Report comments: Paragraph 4.2.2.1 As stated above, the SA of the CSFR needs to assess the alternative of an evidenced-based jobs-led strategy. It also needs to assess the alternative of a phased and controlled development of the Northern Fringe that does not allow multi-site starts or places restrictions on when the three areas of the NF can be developed and/or on the number of sites that can be developed in any one area at the same time.</p> <p>Hyder's SA does not assess the alternative of an evidence based jobs-led strategy. It does not take into account;</p> <p>o most recent EEFM forecasts,</p>	Northern Fringe Protection Group	The National Planning Policy Framework requires planning authorities to plan to meet their objectively assessed housing need and the consideration of alternatives in relation to this have been set out in section 3.3 of the SA of the Proposed Submission Core Strategy. The retail proposed for the town centre is based upon the DTZ 2013 Town Centre Opportunity Areas report. The Suffolk Growth Strategy and the NALP Plan are included within the baseline which has informed the sustainability objectives. The 2013 EEFM data was not available to inform previous drafts and it is considered that the difference between this and the 2012 data is not significant.	

Summary of Response	Respondent	Council's comments	Action required
<ul style="list-style-type: none"> o major net-commuting changes, o the Ipswich SHMA uses obsolete DCLG and not more recent 2011 data, o recent local economic migration figures, o that Ipswich town centre is not identified as a major growth centre in either the Suffolk Growth Strategy or NALEP Strategic Plan, o an over-reliance of IBC on major retail development in the town centre. <p>Further comments: Please explain how Hyder intends to incorporate these key issues into its analysis.</p>			
Para. 2.4.4: removal of a Previously Developed Land target from policy CS9 is a major change and therefore needs to be part of the SA.	Northern Fringe Protection Group	Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to the Policy CS9.	None
Para. 3.1.1: the original SA was flawed because it did not look at alternatives to the policies other than 'do nothing'. The SA of the Core Strategy review must assess alternatives.	Northern Fringe Protection Group	Whilst alternatives in Ipswich are limited, it is agreed that whilst higher density development may not be a viable alternative at this point in time it may be in the future and this will be considered as an alternative.	The SA has considered higher densities in Ipswich Borough as a strategic alternative to addressing housing need through working with neighbouring authorities.

Summary of Response	Respondent	Council's comments	Action required
<p>Table 3.1: should assess changes to policy CS9. Policy CS7 – the most recent data should be used, and reliance on windfalls and neighbouring authorities noted. Policy CS10 – the negative impacts on brownfield development should be considered and wording on phasing looked at. Policy CS13 – should require that the latest East of England Forecasting Model (EEFM) 2013 data are used, and assess growth areas relative to the EEFM / New Anglia Local Enterprise Partnership Strategic Economic Plan / Suffolk Growth Strategy. Policy CS14 should take better account of Ipswich Central's views on the retail sector. Policy CS17 should check for and eliminate unintended consequences.</p>	<p>Northern Fringe Protection Group</p>	<p>Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to the Policy CS9.</p> <p>It is agreed that the Sustainability Appraisal should consider the potential effects of the longer term policy of working with neighbouring authorities.</p> <p>The Ipswich Garden Suburb is proposed to come forward alongside the land allocated for brownfield development within Ipswich and therefore it is not appropriate for the SA to assess any implications of brownfield land not coming forward.</p> <p>Policy CS13 is based upon the most up to date EEFM data available.</p> <p>Without clarity over specifically which of Ipswich Central's views are considered to be not represented, it is considered that the policy is consistent with the aims of Ipswich Central and the supporting text includes reference to working with Ipswich Central.</p> <p>It is not clear what unintended consequences are being referred to however the policy contains flexibility relating to the viability of individual developments.</p>	<p>The Sustainability Appraisal has been revisited in order to consider the effects of working with neighbouring authorities to meet housing need later in the plan period and to consider the strategic alternative of higher density development within Ipswich.</p>

Summary of Response	Respondent	Council's comments	Action required
Table 4.1: the wider implications of the change to policy CS9 [brownfield target] needs to be considered alongside the options for keeping a target at a reduced level.	Northern Fringe Protection Group	Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to the Policy CS9.	None
Para. 4.3.4: the SA needs to recognise that the Core Strategy needs to be better balanced to improve the lives of existing residents through redeveloping poor housing stock, tackling deprivation, reducing crime, improving health, getting people off benefits and back to work. The SA focuses too much on the advantages of new homes to the new residents and the averaging effect of these developments across Ipswich rather than on existing residents in existing wards who will remain disadvantaged and in need.	Northern Fringe Protection Group	These are planning documents and therefore have limited influence over existing dwelling stock. Policies which promote new employment opportunities relate as much to existing residents as to new residents.	None
Para. 4.3.5: the policies do not consider the likely location of new homes to new employment sites, or that new residents in Ipswich Borough will have to commute outside of the Borough to new sites of employment. The policies do not consider the implication of having insufficient jobs to match the number of new residents looking for employment.	Northern Fringe Protection Group	Policy CS13 plans to provide sufficient employment development to provide for the jobs forecast. It should not be assumed that those living in new homes will only be employed in 'new' jobs.	None
Para. 4.3.7: pleased the SA recognises the travel implications in relation to housing development of the Northern Fringe. However, this needs to be better reflected throughout its assessments.	Northern Fringe Protection Group	Further consideration is being given to assessing traffic (air quality) implications of the Garden Suburb development. However, transport impacts and mitigation measures would need to be considered in detail as part of the planning applications, as identified in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014).	Further consideration to air quality / transport has been given through the Sustainability Appraisal process.

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Para. 4.3.10: following recommendations are required: most recent population and employment data should be used and forecasts should be made across district boundaries; a firm jobs growth target will help focus delivery; a better balance between new jobs and homes is needed with homes built near jobs; less reliance on retail growth and better alignment with New Anglia Local Enterprise Partnership growth sectors; a Previously Developed Land target should be reintroduced; policy CS10 and Table 8B should be revised to remove risk of unintended consequences; water supply and sewerage should be addressed; and more should be done to improve the lives of existing residents.	Northern Fringe Protection Group	<p>Policy CS13 plans to provide sufficient employment development to provide for the jobs forecast. It should not be assumed that those living in new homes will only be employed in 'new' jobs.</p> <p>Retail growth is based upon the recommendations of the 2013 Appraisal of Ipswich Town Centre Opportunity Areas study by DTZ.</p> <p>Due to the need to bring forward the Garden Suburb in tandem with brownfield sites it is not appropriate to set a target for brownfield development.</p> <p>Developers and Anglian Water are in discussion on what capacity improvements will be required in relation to the Garden Suburb development.</p> <p>There are a range of policies in the Plan which are intended to improve the lives of existing residents however in terms of provision of housing the plan has little influence over improving current stock. It should not be assumed that new housing would only be occupied by new residents.</p>	None
Table 4.2: needs to recognise the plan does little to improve educational standards in existing schools; little to tackle crime in existing wards, while promoting homes without jobs; little to improve health especially for those in poor housing stock; and nothing to redevelop/improve sub-standard housing. It uses obsolete jobs data and forecasts far exceed historic provision. Impacts on climate change will be negative	Northern Fringe Protection Group	Policy CS13 plans to provide sufficient employment development to provide for the jobs forecast. As a planning document, the plan has limited influence over improving existing stock and directly tackling poor health or improving educational standards.	None

Summary of Response	Respondent	Council's comments	Action required
and the potential sewage issues associated with growth have not been addressed. These omissions need to be rectified as a key objective.		Policy CS17 identifies utilities as infrastructure that would need to be funded by new development.	
Appendix E and Appendix F: as the jobs and homes data used in the Core Strategy is obsolete, have deferred commenting on the specific Impact Assessments until more recent data is utilised.	Northern Fringe Protection Group	Noted. The data used is the most up to date available at the time the Sustainability Appraisal was undertaken.	None
Inconsistencies in the Core Strategy car parking policy and ambiguity in relation to the Bury Road Park and Ride which the Site Allocations development plan document assumes will be reopened and enlarged while the Core Strategy deletes reference to a new park and ride (page 74). The proposals for IP-One expand existing car park capacity but it is rarely insufficient to meet demand. Also inconsistent with the aim for more people to walk and cycle and the reopening / extension of Bury Road Park and Ride. The SA needs to consider these issues accordingly.	Northern Fringe Protection Group	The park and ride reference deleted was in relation to Nacton Road. It should be noted that the proposed extension to the Bury Road park and ride has been deleted due to uncertainty surrounding its future.	None
Evidence base is contested in relation to population projections and employment modelling. Previous rates of forecast jobs growth have not been delivered. Result is high youth unemployment and a low waged and low skilled economy. Impacts of lack of employment need to be assessed against statistics for problematic levels of crime and anti-social behaviour. None of this is explored in the SA. Support the Northern Fringe Protection Group analysis of the jobs issue.	Save Our Country Spaces	As the plan is proposing to support jobs growth, it is unclear how the SA would conclude that this will increase unemployment and crime. Current issues around these are identified in the sustainability issues summary (Table 2.2) and in the baseline in the Scoping Report.	None
Assumptions, projections and estimates behind the growth agenda pursued since 2001 have not stood the test of time. New jobs have not materialised and	Save Our Country Spaces	As the plan is proposing to support jobs growth, it is unclear how the SA would conclude that this will increase unemployment and crime. Current issues	None

Summary of Response	Respondent	Council's comments	Action required
Ipswich has lost manufacturing jobs. Result is a predominantly low waged and low skilled economy with a high level of youth need. Ipswich housing is relatively cheap and Ipswich has high urban densities compared to Suffolk. Thus Ipswich features adversely in terms of deprivation in the Institute for Economics and Peace study April 2013. The SA should examine the impacts of lack of employment together with crime and anti-social behaviour statistics.		around these are identified in the sustainability issues summary (Table 2.2) and in the baseline in the Scoping Report.	
Policy gaps in the Core Strategy review including transport. Ipswich Borough Council has not allowed the known impacts of new development on the transport system to be enshrined in the Core Strategy and to be properly recognised and identified with adverse impacts on air quality, congestion and road safety covered by Section 106 agreements. SA needs to revisit the saved policies from the 1997 Ipswich plan and take account of the policy direction contained in it.	Save Our Country Spaces	Further consideration is being given to assessing traffic (air quality) implications of the Garden Suburb development. However, transport impacts and mitigation measures would need to be considered in detail as part of the planning applications, as identified in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014).	Further consideration to air quality / transport has been given through the Sustainability Appraisal process.
No consistency with previous SA work [on CS10], in particular: regarding high levels of house building; mitigation measures required in the event of slow delivery at the Northern Fringe, not allowing multiple starts which could affect community networking; possible adverse impacts on Fynn Valley; the need to adopt the supplementary planning document before permission is granted for development on SA grounds; bringing forward the start date may undermine previously developed land delivery; the need for a country park as soon as development begins; and viability considerations impacting on open space provision.	Save Our Country Spaces	In order to meet housing need, the Garden Suburb development needs to come forward alongside the redevelopment of brownfield land. It is anticipated in the Supplementary Planning Document Interim Guidance (2014) that around 200 would be built per year from 2018 with housing also coming forward at other locations. The Supplementary Planning Document Interim Guidance (2014) requires initial work at the country park to take place in the early stages of development of the Henley Gate neighbourhood.	None

Summary of Response	Respondent	Council's comments	Action required
Query the scoring in the SA. SA should also be an iterative process but to date it has failed to be. Not reassured by the SA and its unconvincing rhetoric contained within the statements and conclusions. The Institute for Economics and Peace 2013 is not referenced or considered. The SA refers to 'revised policies also found to detract from some SA objectives with potential to have negative effects if no mitigation measures are out in place'. What contingencies are proposed if effective mitigation cannot be achieved, particularly around traffic, pollution and flood risk?	Save Our Country Spaces	<p>The SA has influenced the development of the Core Strategy and Policies DPD through the incorporation of mitigation measures where possible / appropriate.</p> <p>It is not possible for the SA at this level to identify precise effects which can only be identified at the planning application stage.</p> <p>It is not clear in what way the Institute for Economics and Peace should be referred to.</p>	None
Concerned about the impacts on the existing population. If the Ipswich Garden Suburb is not successfully delivered or competently managed, there will be profound adverse consequences for future generations. A key requirement of sustainable development is that future generations will not be compromised (Brundtland).	Save Our Country Spaces	The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) contains detailed measures in relation to securing appropriate infrastructure at the planning application stage.	None
Lack of assessment and possible necessary mitigation for impacts on Suffolk Coastal District Council adjacent villages. There is a duty under the adopted Core Strategy and SA work to assess other local authority growth plans and also mitigate pressures on local Ramsar sites and County Wildlife Sites, e.g. Fynn Valley, which will be adversely impacted and put under intolerable pressure by the Northern Fringe development and development in other authority areas.	Save Our Country Spaces	The Habitats Regulations Assessment process has considered the 'in-combination' effects of development in Ipswich and in Suffolk Coastal on the Stour and Orwell Estuaries SPA. The provision of the country park at the Garden Suburb acts as mitigation.	None
Ipswich has failed to hold congestion at 1999 levels or stabilise air pollution. It has a serious and growing air pollution problem which will be further impacted by these plans [for development at the Northern Fringe]	Save Our Country Spaces	The SA identifies that there will potentially be negative effects on air quality from the Garden Suburb development.	None

Summary of Response	Respondent	Council's comments	Action required
as the development is adjacent and will feed through Air Quality Management Area risk zones to travel to the town centre or schools. The SA assessment of this is flawed.			
Unsustainable loss of best and most versatile agricultural land is objected to. It will compromise future generations and the rural economy by the loss of agricultural jobs.	Save Our Country Spaces	There is insufficient brownfield land in Ipswich to meet housing needs. The SA has noted the potential negative effects on agricultural land.	None
The railway causes significant noise nuisance problems from freight movements at night. Increased use of the Felixstowe line needs assessing in relation to the Red House site. The SA makes no mention of this and guidance must be sought from expert stakeholders e.g. Suffolk County Council Noise and Air Quality Manager.	Save Our Country Spaces	It is agreed that the SA has not identified potential noise issues in relation to the Garden Suburb. However it should be noted that the Supplementary Planning Document Interim Guidance (2014) identifies noise as an issue to be addressed through the Environmental Impact Assessment of any planning application.	The assessment of Policy CS10 identifies noise from the Garden Suburb as a potential issue against SA objective HW2.

Comments on the Scoping Letter Issues in September 2014

Respondent	Summary of Response	IBC response	Suggested Action
Babergh District Council and Mid Suffolk District Council	No comments	Noted	No action needed
Natural England	Satisfied with the scope of the SAs as proposed.	Noted	No action needed
	Supports the proposal to update the evidence base including a refresh of baseline information, key issues within Ipswich and the plans review.	Noted	No action needed
	The need to address potential recreation pressures on the Stour and Orwell Estuaries SPA and Ramsar site will need to be addressed through the SA.	This is being addressed primarily through the Habitats Regulations Assessment process but the conclusions will need to be reflected in the SA.	Once updated, the HRA report results will need to be reflected in SA.
Historic England	Would like to review the Core Strategy and the Site Allocations DPDs before the next consultation, in relation to comments made previously about the NPPF requirements for a positive strategy in relation to heritage not being met.	A copy of the latest versions of the Core Strategy and Policies DPD and the Site Allocations DPD (as at 10.10.14) have been sent to Historic England.	No action needed
	Refers to comments made in relation to the previous consultation dated 28 th November 2013 and on the interim SA reports.	Comments on the previous SA consultations have been taken on board, as detailed in Appendix D of the Interim SA report published in January 2014.	No action needed.

Respondent	Summary of Response	IBC response	Suggested Action
	Consideration should be given to alternative spatial options (or sites) in relation to the SA of the Site Allocations document.	Due to the constrained nature of Ipswich Borough there are limited opportunities for meeting the objectively assessed housing need and therefore sites that are appropriate in planning terms and that could realistically be delivered during the plan period have been allocated.	The revised SA of the Core Strategy will include an assessment of alternative spatial options along with reasoning as to why the options were discounted or not considered reasonable. In addition, the revised SA of the Sites DPD will include alternative site allocations that were discounted for various reasons.
	Awareness and understanding of the historic environment of archaeological sites and issues was limited in both the site allocations document and sustainability appraisal report issued for consultation in early 2014 and needs addressing as a priority. This includes identifying locations of Scheduled Monuments within the Site Allocations document and understanding the potential of non-scheduled sites, particularly where site allocations are proposed.	The SA baseline identifies the heritage assets within Ipswich along with noting the concentration of assets within central Ipswich.	Details of the relevant heritage assets will be referred to on the sites sheets which form part of the Site Allocations document. The SA will also have regard to non-scheduled sites.
	Welcome the amended wording to SA objective ET9. In the first sub-objective the term 'historic buildings and sites' could be replaced with 'heritage assets'.	This change would be appropriate as it would align the sub-objective with the NPPF.	The sub-objective will be amended.
Anglian Water	Satisfied that the report covers essential matters including the need to protect the water environment and the need to adapt to threats posed by climate change.	Noted	No action needed

Respondent	Summary of Response	IBC response	Suggested Action
Northern Fringe Protection Group	The SA could better assess the number and location of new jobs to be created in the Borough relative to new housing, and the implications for the transport network and air pollution. The SA currently assumes a vast number of jobs being created in the town centre but without an evidence base to support this assumption. Air pollution should be considered in relation to EU legal requirements.	The purpose of the SA is to assess the contents of the Core Strategy and Sites DPDs. The SA of the Core Strategy has reiterated the number of jobs that will be created in the borough as stated in the Core Strategy and based on the evidence for that. Job forecasts in the Core Strategy have come from the East of England Forecasting Model.	The SA will consider the potential cumulative effects of new housing and employment generation on vehicle movements, air quality and carbon emissions across Ipswich.
Environment Agency	No comments	Noted	No action needed
Save Our Country Spaces	The previous SA did not recognise the job targets were not realistic and were unachievable. The SA should be more evidence based and take account of the views of the public.	The role of the SA is not to challenge evidence produced as part of the production of the Core Strategy but to assess policies based upon the range evidence and information available (including evidence and data produced outwith the plan production process), including the views of the public gathered through consultation.	No action needed
	Disappointed that an employment led strategy has been abandoned without assessment of the effects. The SA should therefore consider the effects of housing resulting in higher levels of unemployment / commuting.	The SA Framework contains objectives that seek to improve the local economy, create new jobs, promote sustainable transport and reduce private car use.	Policies CS7 and CS10 within the Core Strategy will be assessed against these objectives.
	Higher levels of housing and a larger workforce could have implications on salary	SA objective ER2 enables consideration to given to the effect of policies on rewarding and satisfying employment	No action needed

Respondent	Summary of Response	IBC response	Suggested Action
	levels and therefore poverty levels and this needs to be considered by the SA.	opportunities and objective ER1 considers poverty.	
	The impacts on the wider transport network of the change in focus of the Core Strategy should be assessed. Detailed traffic assessment and modelling needs to be undertaken across Ipswich Borough and neighbouring authority areas, taking account of employment sites and housing sites. This is required under the Duty to Cooperate. This needs to consider impacts on air pollution including AQMAs – traffic from the Northern Fringe will pass through AQMAs.	Further consideration will be given to air quality effects arising from the Garden Suburb development. However, detailed traffic assessments would be undertaken at the planning application stage.	The SA of the Core Strategy and Sites DPDs will consider the potential cumulative effect of increasing housing and jobs on traffic movements and air quality.
	The SA should assess and compare the sustainability benefits of a realistic jobs-led Core Strategy and a housing-led Core Strategy, including assessments of a co-operative approach between Ipswich Borough and neighbouring authorities.	The Draft Core Strategy and Policies Focused Review – Interim SA Report (December 2013) assessed the ‘new’ policies against the adopted 2011 policies in this respect and provided commentary on this.	None
	The SA lacks data in relation to monitoring air quality impacts from traffic, particulate impacts and impacts on health from air pollution, including cumulative and compound impacts from multiple sources of air pollution, including impacts from Europe.	Further consideration will be given to air quality effects arising from the Garden Suburb development. Unclear how impacts from Europe could affect Ipswich. It should be noted that mitigation will be / is provided within the Garden Suburb SPD and the proposed Low Emissions SPD and Cycling SPD.	The SA of the Core Strategy and Sites DPDs will consider the potential cumulative effect of increasing housing and jobs on traffic movements and air quality.
	The SA needs to consider the impact of the levels of housing being proposed on jobs, in terms of higher unemployment in the	Job forecasts are provided through the East of England Forecasting Model. The provision of homes to meet labour	The updated Employment Topic Paper will provide greater explanation

Respondent	Summary of Response	IBC response	Suggested Action
	Borough or residents commuting to elsewhere. The SA needs to consider the effect of a larger number of residents competing for a smaller amount of jobs and take account of average salary levels in Ipswich. The SA of the Northern Fringe will need to be revised to take account of this.	supply requirements is covered by the final sub-objective under SA objective ER2. However, whilst there is a link between number of jobs and provision of housing there is no simple 'ratio' that can be applied due to the multiple variables involved. The Core Strategy plans to meet both the land requirements of the jobs forecast and, as far as possible, the housing needs. The baseline of the SA identifies that Ipswich has lower than average salary levels. The 2012 Strategic Housing Market Assessment concluded that household projections would be broadly similar under either the DCLG household projections (population based) or the East of England Forecasting (labour market projections).	of the relationship between housing and jobs provision.
	Reference should be made to the implications of the recent Defra consultation on local air quality monitoring.	As a final document has not been published there is no certainty over future changes to local air quality management. The consultation set out a range of options however the purpose of any changes is to focus more action on meeting EU targets and less on the reporting and monitoring processes themselves. This overall intention could be referred to in the assessment of plans and programmes.	The 'Local Air Quality Management Consultation on options to improve air quality management in England' consultation (DEFRA, 2013) will be added to the review of relevant plans, programmes and environmental objectives in the SA Report appendices along with an explanation of its significance as per our response in the column to the left.
	The SA must consider the implications of the Core Strategy allowing the Northern Fringe developments to come forward	The Draft Core strategy and Policies Focused Review – Interim SA Report (December 2013) considered effects of	The SA will consider the implications of all housing at the Garden Suburb.

Respondent	Summary of Response	IBC response	Suggested Action
	simultaneously rather than in a phased manner. There may be implications if one or more developers or landowners have financial issues, this may have implications for infrastructure delivery. The use of Grampian conditions or a safety net fund could help to avoid such issues.	3,500 dwellings being provided at the Garden Suburb by 2031.	
	Comments submitted in relation to previous consultations were submitted as appendices.	Noted. Actions have been made in relation to these comments where relevant/appropriate through previous iterations of the SA, as detailed in appendices to the SA reports.	No action needed.
Save Our Country Spaces (received late)	The Housing Charter for Suffolk should be considered as part of the SA process.	At present the Housing Charter is in draft format, if finalised prior to the submission of the SA it will be added to the plans, programmes and environmental objectives appendix of the SA Reports. However, it should be noted that its inclusion would not affect any conclusions in the SA.	No action needed.

Consultation Comments on the Proposed Submission SA Report

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5485	Northern Fringe Protection Group (Mr Brian Samuel) [976]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	Table 3-2 fails to use the most recent baseline data. Suggested improvements to the objectives and indicators in Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.	Table 3.2 is a summary of the data provided in Appendix B. The most up to date published data has been used. Comments received in relation to Table 2.3 in the Interim SA Report (Dec 2013) (now Table 3-3) are responded to in Appendix C of the Proposed Submission SA Report (Dec 2014).
5498	Northern Fringe Protection Group (Mr Brian Samuel) [976]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	The SA underestimates the impact of Objective ER3. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.		The assessment in 3.2 is an assessment of the SA objectives against each other, without considering any potential effects of the plan. It is agreed that the paragraph in 3.2.4 should have been amended and this is acknowledged in section 4 of the addendum that traffic effects are probable although not inevitable, when considering the compatibility of the SA objectives.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5609	Save Our Country Spaces (Mrs Barbara Robinson) [978]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	SOCS commented previously (September 2014) in response to IBC's updated SA scoping consultation letter. SOCS feel the responses given to key issues in the letter sent do not address these key issues [the need to incorporate an updated evidence base and give more detailed consideration to alternative spatial options] sufficiently. SOCS reserve the right to continue to question the "evidence base".		The response from SOCS to the September 2014 Scoping Letter is responded in Appendix C of the Proposed Submission SA (Dec 2014). Available and relevant data which lends itself to the strategic assessment of effects relating to air quality has been incorporated within the baseline.
5730	Save Our Country Spaces (Mrs Barbara Robinson) [978]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA underestimates the impact of Objective ER3. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.		The assessment in 3.2 is an assessment of the SA objectives against each other, without considering any potential effects of the plan. It is agreed that the paragraph in 3.2.4 should have been amended and this is acknowledged in section 4 of the addendum that traffic effects are probable although not inevitable, when considering the compatibility of the SA objectives.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5494	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.1 The Vision	OBJECT	The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	The jobs target needs to be re-appraised.	The jobs figure of in the region of 12,500 in Policy CS13 does relate to Ipswich Borough. The Pre-Submission Main Modifications include an amendment to CS13 for clarity in this respect.
5728	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.1 The Vision	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	The jobs target needs to be re-appraised.	The jobs figure of in the region of 12,500 in Policy CS13 does relate to Ipswich Borough. The Pre-Submission Main Modifications include an amendment to CS13 for clarity in this respect.
5499	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies	OBJECT	Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	A wider range of alternatives should be considered including a jobs led strategy, locating homes nearer to new employment sites, co-operating more closely with neighbouring authorities and delivering jobs and homes on the Sugar Beet Factory site.	The Core Strategy must plan for both the homes required and jobs forecast up to 2031. Due to the tightly drawn boundary of Ipswich Borough, all housing sites that are understood to be deliverable and viable up to 2031 have been allocated. Co-operating with neighbouring authorities relates to the process of considering growth outside the boundary which will form part of future work, rather than an alternative to the proposed strategy. The sugar beet factory site is beyond the boundary of the Borough and therefore outside of the scope of this plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5731	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	A wider range of alternatives should be considered including a jobs led strategy, locating homes nearer to new employment sites, co-operating more closely with neighbouring authorities and delivering jobs and homes on the Sugar Beet Factory site.	The Core Strategy must plan for both the homes required and jobs forecast up to 2031. Due to the tightly drawn boundary of Ipswich Borough, all housing sites that are understood to be deliverable and viable up to 2031 have been allocated. Co-operating with neighbouring authorities relates to the process of considering growth outside the boundary which will form part of future work, rather than an alternative to the proposed strategy. The sugar beet factory site is beyond the boundary of the Borough and therefore outside of the scope of this plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5486	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.1	OBJECT	Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5727	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.1	OBJECT	Endorse NFPG points. Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5501	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.2	OBJECT	Joint evidence base documents for the Ipswich Policy Area have not been made available. Jobs targets for the four Ipswich Policy Area authorities are 26% higher than the January 2015 EEFM forecasts and are therefore at risk of being unrealistic. Evidence needs to be provided that the jobs targets will provide sustainability benefits and that the Core Strategies of neighbouring authorities take account of the need to deliver 4,000 extra homes and that the sustainability effects have been assessed. If the jobs target is sustainable why do jobs and homes need to be provided in other authority areas.		Evidence base documents relating to the Ipswich Policy Area are included within the Core Document library, including the Strategic Housing Market Assessment (2012) and Ipswich Housing Market Area Population and Household Projections (2013). The Employment Land Needs Assessment is to be published prior to Submission. The jobs figure relates to Ipswich Borough. The residual housing need will be addressed through future joint or aligned plans.
5612	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.2	OBJECT	The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the new SA. This can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work. This approach is		The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
				required under the Duty to Co-operate.		
5481	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.3	OBJECT	SA should assess effects of 13,550 homes against evidence illustrating 10,434 are needed. SA should consider effects of multiple starts at the Garden Suburb. Conclusions of CBRE traffic assessment should be considered. SA should assess implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling. The effect on redevelopment through removal of the brownfield land target and	The SA needs to assess the effects of delivering 13,550 homes when evidence suggests this should be 10,434. The SA should take account of the change to Table 8B. The SA should recognise the effects identified through the transport assessment submitted with the CBRE application. The removal of the brownfield land target should be	The DCLG/ONS Household Projections are trend based and Planning Practice Guidance states that these could be viewed as a starting point when identifying the Objectively Assessed Need. As there is a residual need for 3,778 dwellings to be met through joint working with neighbouring authorities, it is considered highly unlikely that a revised OAN would affect the strategy in the Core Strategy Review in terms of development within Ipswich Borough. The triggers in Table 8B are indicative – the SA has assessed policy CS10 as proposed.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
				multiple starts at the Garden Suburb should be assessed.	better considered in the SA.	
5613	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.3	OBJECT	<p>The adopted CS allows for a phased approach to development of the NF. Its SA judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the NF without locational restrictions. A detailed examination of the implications of this change must be included in the new SA and a full critique of the rationale.</p> <p>Multiple starts may pose the risk that if a developer/landowner hits financial problems, the added burden [of infrastructure provision] falls on remaining landowners/developers, making their operation unviable and halting delivery, resulting in blight. Grampian Conditions are not</p>	<p>A "safety net fund" needs to be arranged and established as mitigation, -reserve matters? - or perhaps Grampian Conditions with front loaded finance ahead of any planning permission being granted and started.</p>	<p>It is not the case that the SA of the adopted Core Strategy judged multiple starts specifically as unsustainable. The SA of CS10 in the Proposed Submission Core Strategy Review reflects the allocation for 3,500 dwellings. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development. Pre-Submission Main Modifications to CS10 provide additional security for the development coming forward in a comprehensive manner.</p>

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
				mentioned within the Scoping report.		

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5597	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.3	OBJECT	SA is not fit for purpose. The adopted CS allows a phased approach to development of the Northern Fringe/IGS and its SA judged multiple starts as unsustainable. The revised CS now allows multi-site development across the NF. A detailed examination of the implications must be included in the new SA and a full critique of the rationale behind the proposed changes. With multiple starts, if one developer hits financial problems, the added burden on remaining developers may make their operation unviable and halt delivery. This would blight the land. What contingency is there if market forces impact on infrastructure delivery?	A "safety net fund" needs to be arranged and established as mitigation or Grampian conditions with front loaded finance ahead of planning permission being granted and started. The Hyder Scoping Report does not mention Grampian Conditions.	It is not the case that the SA of the adopted Core Strategy judged multiple starts specifically as unsustainable. The SA of CS10 in the Proposed Submission Core Strategy Review reflects the allocation for 3,500 dwellings. The Ipswich Garden Suburb SPD Interim Guidance has been produced and adopted as interim guidance, which identifies the infrastructure expected to support the IGS development. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development. In order to avoid the problems highlighted in the SOCS response, safeguards to ensure the continued delivery of the developments alongside infrastructure will be a matter to be considered as part of this work. Pre-Submission Main Modifications to CS10 provide additional security for the development coming forward in a comprehensive manner.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5495	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.4	OBJECT	The SA needs to take account of the outputs from the Viability Testing for Ipswich Borough Council report which questions the viability of office, industrial and warehouse development. The jobs figure is based on over-estimated population growth, the SA should take this into account. The viability study challenges the viability of the Westgate site and the SA has not acknowledged this. The SA should recommend measures to improve the retail offer and deliver new jobs. The SA should assess the impact of developing the Sugar Beet Factory site on the delivery of the Core Strategy.	The SA should consider the conclusions of the viability report, assess the implications of the purchase of the Sugar Beet Factory site and recommend measures to improve retail and jobs delivery.	It is not the role of the SA to assess the viability of sites put forward for development. The Sugar Beet Factory site is allocated as a strategic employment site allocation through the Babergh Core Strategy and cumulative effects with other plans and strategies have been considered in section 5 of the SA report and further within this addendum.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5611	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.4	OBJECT	SOCS argued [previously] that IBC's Core Strategy was unsustainable as it was based on unrealistic job targets. The previous SA failed to recognise these concerns. Evidence now shows that the jobs target was unsustainable and the original SA incorrectly assessed the CS as sustainable. A more evidence-based approach to SA is required. We are disappointed that IBC has ditched the employment-led strategy in favour of a housing-led approach. There has been no assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy. The SA needs to consider the implications of this key change.		The SA considers the effects on the sustainability objectives of the strategy to deliver the housing and employment land requirements. It is not the role of the SA to produce alternative evidence. An Employment Land Needs Assessment is currently being produced and the SA findings will be considered against this when it is published.
5502	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.6	OBJECT	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5732	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.6	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5503	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.7	OBJECT	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.
5496	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.7	OBJECT	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5729	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.
5733	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5504	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.2	OBJECT	delivered before occupation of the first dwelling. DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 states that existing hedgerows of amenity or biodiversity value should be retained where possible. It is not clear how 'important' would be defined if this is to mean anything other than those with amenity or biodiversity value.
5734	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.2	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country	DM10 states that existing hedgerows of amenity or biodiversity value should be retained where possible. It is not clear how 'important' would be defined if this is to mean anything other than those with amenity or biodiversity value.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5505	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.4	OBJECT	Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	<p>Park should be delivered before occupation of the first dwelling.</p> <p>The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.</p>	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5735	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.4	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5506	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.6	OBJECT	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modelling needs to be updated.	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas and recognise that the employment target relates to the Ipswich Policy Area.	The jobs forecast relates to Ipswich Borough and the Pre-Submission Main Modifications include a change to CS13 to clarify this. Cumulative effects, including with neighbouring authorities' plans are considered in Section 5 of the SA report and further within this addendum. The traffic modelling is being updated and once completed the SA will be revisited to consider whether there are any implications for the SA's conclusions. The SA identifies that there may be negative effects from traffic related to employment uses, but that a policy which did not cluster employment uses together in these locations may in fact lead to greater traffic movements.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5736	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.6	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modelling needs to be updated.	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas and recognise that the employment target relates to the Ipswich Policy Area.	The jobs forecast relates to Ipswich Borough and the Pre-Submission Main Modifications include a change to CS13 to clarify this. Cumulative effects, including with neighbouring authorities' plans are considered in Section 5 of the SA report and further within this addendum. The traffic modelling is being updated and once completed the SA will be revisited to consider whether there are any implications for the SA's conclusions. The SA identifies that there may be negative effects from traffic related to employment uses, but that a policy which did not cluster employment uses together in these locations may in fact lead to greater traffic movements.
5507	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.7	OBJECT	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
					delivered before occupation of the first dwelling.	
5737	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The results of the Core Strategy HRA have been reflected more directly in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5508	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.8	OBJECT	The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The text quoted relates to policy DM31 which does contain specific protection for European sites. The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.
5738	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.8	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The text quoted relates to policy DM31 which does contain specific protection for European sites. The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5480	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Appendix B - Baseline Data	OBJECT	The best available data has not been used. More recent data on air quality, average weekly wages, sports/open space provision, population and employment is available. Data showing changes in the number of jobs over the years should be included. The most recent DCLG, ONS and EEFM forecasts should be included. The Trend Migration scenario is flawed.		The Council is not aware of the more recent data being referred to in the first sentence. It is not the role of the SA to provide alternative evidence, but to assess the effects of the proposed policies upon the SA objectives.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5610	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Appendix B - Baseline Data	OBJECT	Regarding Air Quality and air Pollution impacts, the SA is totally lacking in capacity to reflect the current situation regarding lack of resource; e.g. lack of data and continuous monitoring within Ipswich from traffic, lack of particulate impacts; lack of progress in responding to emerging health impacts from Air pollution; lack of work and remit within the SA for Cumulative and compound impacts for Ipswich from multiple sources of air pollution i.e. Industrial, biomass, clinical and traffic and also from the crematorium. Also from "chem trails" from overhead aircraft. All in combination from impacts from Europe impacting Ipswich adversely.		The level of detail suggested by the response is beyond the scope of the SA which is providing a strategic level assessment of the effects of the plan.
5484	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Appendix C - Consultation Comments	OBJECT	Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.	Appendix C of the Proposed Submission Core Strategy SA report contains a response to each comment made on the Interim SA reports.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5726	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Appendix C - Consultation Comments	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.	Appendix C of the Proposed Submission Core Strategy SA report contains a response to each comment made on the Interim SA reports.
5483	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.		The SA has highlighted negative impacts where there is the potential for these to occur and identified mitigation measures which were taken on board in the Proposed Submission Core Strategy review (see Annex to Proposed Submission Sustainability Reports (December 2014).

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
24075	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	The manner of "last minute", poorly drafted "revisions" to the Executive paper on the 15th October [2013] on CS10 were unacceptable, and in breach of protocols and SCI. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the public interest. The revisions make a fundamental change in direction that has "seriously undesirable unintended consequences" which should be properly referenced, appraised and evaluated within the SA. The CS10 changes are not properly referenced nor track-changed within the SASR.		The Scoping Report is not the tool for identifying changes to policies. However, the SA report assessed the policies as contained within the Proposed Submission Core Strategy review based upon the assessments which were undertaken in the Interim SA report. It is unclear what revisions to the Executive paper are being referred to. This Executive paper set out the approach proposed in the Draft Core Strategy Focused Review (October 2013) which was subsequently published for consultation between January and March 2014. The changes to CS10 were shown in 'track changes' in the Draft Core Strategy Focused Review document.
5725	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.		The SA has highlighted negative impacts where there is the potential for these to occur and identified mitigation measures which were taken on board in the Proposed Submission Core Strategy review (see Annex to Proposed Submission Sustainability Reports, December 2014).

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5620	Natural England (Mr John Jackson) [1413]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	Natural England is reasonably satisfied that the Sustainability Appraisal considers the impacts of the Core Strategy and Policies on relevant aspects of the environment within our remit, including biodiversity and geology, landscape, green infrastructure and soils. We particularly welcome SA objectives to protect and enhance designated sites, including SSSIs, SACs, SPAs and Ramsar sites, in addition to locally designated and non-designated areas of biodiversity. However, we would advise that the SA should cross-reference with the findings and recommendations of the Appropriate Assessment which identifies potential recreational disturbance effects on European sites and measures to mitigate these.		The assessment of CS7 refers to the conclusions of the SA, however further references to the HRA have been included within this Addendum.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5500	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 5: CUMMULATIVE EFFECTS	OBJECT	The SA does not take account of the cumulative effects of Core Strategies in neighbouring authority areas regarding housing, employment, traffic/transport and air quality. There is no evidence of any strategic policy outcomes from the Ipswich Policy Area. The jobs targets of the four local authority areas within the Ipswich Policy Area are 26% higher than the total January 2015 EEFM forecast and there is a risk that the jobs targets are unrealistic.	The cumulative effects of neighbouring authority's plans need to be assessed. The SA should take account of any effects from the IPA Board.	Evidence base documents relating to the Ipswich Policy Area are included within the Core Document library, including the Strategic Housing Market Assessment (2012) and Ipswich Housing Market Area Population and Household Projections (2013). The Employment Land Needs Assessment is to be published alongside prior to Submission. The jobs figure relates to Ipswich Borough. Section 5 of the Proposed Submission Core Strategy SA refers to cumulative effects with neighbouring authorities.
5594	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 5: CUMMULATIVE EFFECTS	OBJECT	Likely predicted Climatic Change and adverse climatic weather impacts are insufficiently addressed with insufficient work on Compound and Cumulative Impacts likely, especially from the Suffolk Coastal District growth and expansion plans. A Joint Environmental Impact Assessment of the Core Strategy is needed for the whole of the Ipswich Policy Area. An isolated EIA on the Northern Fringe would provide no necessary safeguards for public health. Hyder's SA does not address the issues we suggest. (see Appendix E [of full submission] - SOCS 2 Sept 2014 SA Scoping Update Consultation).		Section 5 considers cumulative effects, however this has been expanded in this addendum to refer to proposed developments close to Ipswich. The issues raised by SOCS in their letter of 2nd September 2014 have been responded to in Appendix C of the Proposed Submission Core Strategy SA report.

Sustainability Appraisal Matrices – Core Strategy Policies

Spatial Strategy

- Policy CS2: The Location and Nature of Development

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
ET1 To improve air quality	CS2: -	Medium and Long-term Direct and Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities Notably central Ipswich including AQMAs	<p>The policy focuses a large proportion of growth within the IP One area and district centres which could be seen as a positive as these areas contain the majority of amenities and jobs and can also be accessed by public transport. However, in spite of this it is also likely that overall vehicle trips in these areas will increase which may affect the borough's town centre AQMAs. The other large area of development is the Garden Suburb site. This is also likely to increase vehicle trips which may affect local air quality and potentially the AQMAs. However, a significant emphasis has been placed on promoting sustainable travel to this site which should reduce this impact. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is likely to be negative overall.</p> <p>The policy also provides for c.4,000 homes potentially being developed in neighbouring authority areas in the longer term. Depending on their location this may also affect air quality in their localities. However, without knowing exactly where these could be located there is considerable uncertainty at this stage regarding this.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. When working with neighbouring</i></p>	<p>Securing a higher density of new homes within housing sites (i.e. approximately a further 4,000 homes) within the borough has significant potential to worsen traffic and air quality in the long-term and may affect the town centre AQMAs. This is in spite of the proposed mitigation measures that would be required to manage this issue. Conversely, there is greater certainty that these issues would not be realised in neighbouring authorities as a result of meeting Ipswich's housing need.</p> <p>This alternative only changes the housing element of Policy CS2, therefore the assessment of other elements are the same as the assessment of CS2.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<i>authorities to address housing need consideration should also be given to impacts on air quality within Ipswich from any development that takes place outside Ipswich.</i>	
ET2 To conserve soil resources and quality	CS2: +/-	Short, Medium and Long-term Direct / Indirect Reversible Low Certainty	Borough wide and neighbouring authorities	Approximately 30% of the housing need within the borough would be developed on previously developed land which represents a sustainable use of soil resources, although this assumes 0% of residual need would be on PDL which in reality may not be the case. However, the remainder, particularly those constructed on the Garden Suburb site would be on greenfield land and would affect soil resources along with the soil's functionality in those areas (along with Grades 2 and 3 Agricultural Land). It is not known where housing would be developed in neighbouring authorities at this stage so the impacts on soil there are uncertain (it should be noted that there are large swaths of Grade 2 and 3 Agricultural Land in neighbouring authorities).	Higher density development means there would be a higher density on previously developed land which would be good for conserving soil resources. However, conversely this option would result in a greater loss of green areas within the Garden Suburb. We don't know whether development in neighbouring authority areas would be on greenfield / brownfield land therefore we do not know how this alternative would compare to proposed CS2. However, soil resources would be conserved in neighbouring authorities.
ET3 To reduce waste	CS2: 0	N/A	N/A	Effects have been assessed as neutral as the purpose of this policy is to provide information about the location and nature of development which wouldn't strictly affect the amount or proportion of waste generated.	Given this alternative would mean more development within Ipswich rather than neighbouring authorities the volume of waste arisings for Ipswich would be greater and they would be lower in adjacent authorities.
ET4 To reduce the effects of traffic upon the environment	CS2: -	Medium and Long-term Direct and Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	The policy focuses a large proportion of development within the IP One and district centres which could be seen as positive as these areas contain the majority of amenities and jobs and can also be accessed by public transport. However, in spite of this it is also likely that overall vehicle trips in these areas will increase. The other large area of development is the Garden Suburb site and although there is a significant	Securing a higher density of new homes within housing sites (i.e. approximately a further 4,000) within the borough has the potential to worsen traffic and congestion in the long-term. This is in spite of the proposed mitigation measures that would be required to manage this issue. Conversely, there is greater certainty that these issues

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<p>emphasis placed on promoting sustainable travel to this site (also outlined in the SPD) an increase in car use is, to an extent, inevitable.</p> <p>The policy also provides for c.4,000 homes potentially being developed in neighbouring authority areas in the longer term. Depending on their location this may also affect trip generations in their localities. However, without knowing exactly where these could be located there is considerable uncertainty at this stage regarding this.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i></p>	would not be realised in neighbouring authorities as a result of Ipswich's housing need.
ET5 To improve access to key services for all sectors of the population	CS2: +	Short, Medium and Long-term Direct / Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>Focussing the majority of new development within walking distance of Ipswich's district centres would benefit this SA Objective as it would facilitate access to essential services and facilities which would also serve to provide support for community development. The policy also seeks to distribute areas of open space throughout Ipswich which is connected to ecological networks and green corridors which again would benefit this SA Objective.</p> <p>The Garden Suburb site would provide a new district centre and facilities (including open space) which would ensure access is not compromised for new residents.</p>	Securing a higher density of new homes within the housing sites may help to sustain services than proposed CS2. Although conversely may increase pressure on existing services. However, it should be noted that the proposed CS2 would provide more opportunities to incorporate areas of open space into residential development along with green infrastructure than the alternative.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				Although the above has been assessed as positive overall there remains an element of uncertainty due to the location of new housing required in neighbouring authorities being unknown – therefore access to key services in those areas is unknown.	
ET6 To limit and adapt to climate change	CS2: -	Medium and Long-term Direct and Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The policy focuses a large proportion of housing development within the IP One and district centres which could be seen as a positive as these areas contain the majority of amenities and jobs and can also be accessed by public transport. However, in spite of this it is also likely that overall vehicle trips in these areas will increase which may increase carbon emissions. The other large area of development is the Garden Suburb site and although there is a significant emphasis placed on promoting sustainable travel to this site (also outlined within the Garden Suburb SPD), an increase in car use is to an extent, inevitable – along with an increase in carbon emissions.</p> <p>There are also large areas of Flood Zones 2 and 3 within IP One therefore new development has the potential to increase flood risk, although, it is appreciated that this issue is covered elsewhere within the Core Strategy.</p> <p>The policy provides for developing c.4,000 homes through working with neighbouring authorities in the long-term. Depending on the location of new development this may also affect carbon emissions and flooding in their localities. However, without knowing where these could be located there is considerable uncertainty at this stage regarding this.</p>	By concentrating development in Ipswich there is a greater potential for cycling/walking opportunities. Therefore, may help to minimise emissions from travel related to the c.4,000 new homes (although possibly not reduce overall). Whereas this would be less certain under the proposed CS2 as this would depend on the location as to whether there would be realistic opportunities to walk / cycle. This option may place greater pressure to develop on areas at risk of flooding. In addition, higher density development within areas susceptible to flooding would only exacerbate current issues as there would be a reduced scope to incorporate open space and SuDs measures.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i>	
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS2: +/-	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	Policy CS2 seeks to promote development at the Garden Suburb which is located on greenfield land which may affect local ground water quality through runoff. However, the policy also seeks to maximise development on previously developed land which would result in positive effects on this SA Objective. As stated above there are large areas of Flood Zones 2 and 3 within IP One therefore locating development in this area has the potential to increase flood risk, although, it is appreciated that this issue is covered elsewhere within the Core Strategy. There remains an element of uncertainty as the location of new homes in neighbouring authorities is not known - therefore effects on ground water quality cannot be assessed.	This option may place greater pressure to develop in areas of flood plain given the lack of alternative options. In addition, higher density development within areas susceptible to flooding would exacerbate current issues as there would be a reduced scope to incorporate open space and SuDs measures. Conversely, any potential water pollution or flood risk in neighbouring authorities would be avoided.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable	CS2: +/-	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	The policy does not intend to propose development in areas that are covered by ecological designations. However, the proposals for the central urban areas and IP-One development are near to the Ramsar and SPA designations (also SSSI). It is not anticipated that the proposals would have likely significant effects on these areas directly although it will be important to consider the indirect effects of	Securing a higher density of new homes within the housing sites may lead to greater adverse effects on biodiversity on proposed CS2 as there would be less scope to provide new green infrastructure, areas of open space or potential new Local Nature Reserves – all of which create opportunities for habitat creation.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
conditions on SSSIs, SPAs and SACs				<p>recreational pressure and undertake Habitats Regulations Assessment in conjunction with Natural England. The Appropriate Assessment concluded no adverse effect upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.</p> <p>The policy seeks to create new areas of open space in addition to linking ecological networks and green corridors across Ipswich. The policy seeks to avoid development on ecologically sensitive sites and maximises development on previously developed land.</p> <p>Although the Garden Suburb site in particular takes up a lot of greenfield land, it isn't covered by any statutory ecological designations. However, it should be noted that, the nature of development proposed is likely to result in cumulative losses of habitat (albeit likely to be of lower value) across the borough. For these reasons effects have been assessed as both positive and negative.</p> <p>In addition to the above there remains an element of uncertainty against the SA Objective as c.4,000 new homes are proposed in neighbouring authorities and the locations are unknown.</p>	As the location of new homes in neighbouring authorities is unknown it is difficult to directly compare the proposed CS2 and this alternative option. Although it should be noted that neighbouring authorities contain a SPAs Ramsar sites, SSSIs etc which would be protected by this approach.
ET9 To conserve and where appropriate	CS2: -	Short, Medium and Long-term Direct	Borough wide and neighbouring authorities	Effects were recorded as overall negative against Policy CS2. Whilst no known heritage assets are anticipated to be directly affected, new development has the potential to adversely affect the setting of these assets if inappropriate.	Securing a higher density of new homes within the housing sites may lead to greater adverse effects on the setting of heritage assets as there would be less scope to provide

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
enhance areas and sites of historical importance		Reversible Medium / Low Certainty		<p>Conversely, a high quality development near to a heritage asset that complements it or improves an existing poor quality site may benefit its setting. Without knowing these local details at this stage it is not possible to make an accurate assessment against this objective. In addition, general development could also affect unknown archaeological remains although this is also uncertain. The purpose of this policy is not to seek to protect heritage assets, this is provided in DM8. It should be noted that the policy does require new development to demonstrate principles of high quality architecture and design which would only benefit the SA Objective along with the commitment to ensure new development does not compromise heritage assets.</p> <p>There remains an element of uncertainty against Policy CS2 as the location of new housing in neighbouring authorities is currently unknown – therefore effects on heritage assets outside the borough are unknown.</p>	<p>soft landscaping that includes green infrastructure. Both of which may offer benefits to the setting of heritage assets.</p> <p>As the location of new homes in neighbouring authorities is unknown it is difficult to directly compare the proposed CS2 and this alternative option.</p>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS2: -	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	The policy seeks to facilitate growth across Ipswich and the Garden Suburb site would result in the removal of a large area of undeveloped land at the urban fringe. However, the policy makes a commitment to ensuring new development is defined to specific areas and demonstrates principles of very high architecture and urban design. <i>Policy DM29 would help to mitigate through requiring new development provides tree planning, new areas of open space and urban greening schemes.</i> It is also likely that the redevelopment of derelict	<p>Securing a higher density of new homes within the housing sites may lead to greater adverse effects on the setting of landscape / townscape character and quality as there would be less scope to provide soft landscaping including open space and green infrastructure. All of which offer benefits to landscape / townscape character.</p> <p>As the location of homes in neighbouring authorities is not known we cannot directly compare what might have been affected in the proposed CS2 with issues of higher density in this alternative option.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<p>sites within the central urban areas could improve the existing townscape.</p> <p>However, on balance, given the loss of the areas of greenfield land to the north, the effects have been scored as minor negative overall.</p> <p><i>The policy may benefit from a specific reference to ensuring the public realm is of a high quality design along with new structures. Design mitigation is provided in the Garden Suburb SPD, Policy DM5 and the Urban Character SPD.</i></p> <p>There remains an element of uncertainty as the location of new housing in neighbouring authorities required is currently unknown – therefore effects on landscape / townscape character outside the borough is unknown.</p>	
<p>HW1</p> <p>To improve the health of those most in need</p>	CS2: +	<p>Medium and Long-term</p> <p>Direct</p> <p>Reversible</p> <p>Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities</p>	<p>The policy seeks to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving connectivity across Ipswich and ensuring new development has good transport links. The policy also seeks to create new areas of open space throughout the borough which may provide opportunities for recreation. All of the above would seek to promote healthy lifestyles and may help to reduce overall high levels of health and disability deprivation particularly within the west of the borough.</p> <p>Focussing development near to centres could also improve access to healthcare for all.</p>	<p>An increase in density would result in a reduction in the amount of open space and green infrastructure that could be incorporated into new development which could mean reduced health and wellbeing benefits.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				Development at the Garden Suburb would also create accessible formal open space as currently it is agricultural land. There remains an element of uncertainty as the location of c. 4,000 new homes in neighbouring authorities is unknown.	
HW2 To improve the quality of life where people live and encourage community participation	CS2: +/-	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	New development is likely to add to current noise and light pollution, particularly on large greenfield sites such as the Garden Suburb site. On smaller, infill sites this is less likely to be significant – i.e. within the IP One area. The redevelopment of previously developed urban sites is likely to be positive and in all cases development with positive design and planning around district centres could help to improve a sense of community. There remains an element of uncertainty regarding the 4,000 homes in neighbouring authorities as their locations are unknown.	Securing a higher density of new homes within the housing sites may increase noise complaints as there would be more people living at each development. There is the potential for higher density development to lead to greater adverse effects on social-cohesion than the proposed CS2. This is because there would be more people living at each development, therefore increasing the chance of potential frictions arising. In addition, an increase in density would result in a reduction in the amount of open space, green infrastructure that could be incorporated into new development.
ER1 To reduce poverty and social exclusion	CS2: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	According to the Index of Multiple Deprivation (2010) 26.6% (35,500) of Ipswich's population lives within the most deprived fifth of areas in England, ranking 72 out of 294 local authorities. Nine areas of the town are ranked within the bottom 10% most deprived areas nationally with 7,425 children living in households where no-one works. Promoting significant growth as per this policy would contribute to providing better quality new homes together with creating new employment opportunities and improved access to amenities and jobs via sustainable transport modes. It would	An increase in density would result in a reduction in the amount of open space, green infrastructure that could be incorporated into new development. Other than this the alternative would perform the same as the proposed CS2 as increasing density is unlikely change existing poverty levels or affect social exclusion.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<p>also provide support for community development which would promote wellbeing and social inclusion.</p> <p>Improving accessibility to areas of open space and creating new areas of open space along with improvements to the borough's green infrastructure may also contribute to reducing overall health and disability deprivation through encouraging healthy lifestyles – although certainty for this is low.</p> <p>There remains an element of uncertainty as the location of new housing in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown.</p>	
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS2: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The most deprived area in Ipswich with regards to income and employment is within the town centre or IP One area. Focussing new office, hotel, cultural, leisure and retail – along with educational development within this area may help to alleviate this deprivation.</p> <p>Focussing a proportion of employment development within the town centre may also ensure physical accessibility to new jobs is maximised.</p> <p>There remains an element of uncertainty as to whether residents of the c.4,000 new homes located outside the borough would have opportunities for rewarding and satisfying employment as the locations of homes are not known.</p>	<p>Higher housing densities close to employment sites would be beneficial in terms of improving access to jobs – although this would depend upon the types of jobs available in those locations.</p> <p>We do not know where the 4,000 homes in neighbouring authorities would have been located. Therefore comparing this element of the proposed CS2 with the alternative is difficult. Needless to say this alternative would benefit Ipswich's job market to a greater degree than the Proposed CS2 as homes would be focussed within Ipswich rather than rather than neighbouring areas'.</p>
ER3	CS2: +	Short, Medium and Long-term	Borough wide and	Policy CS2 supports the regeneration and sustainable growth of Ipswich through focusing new residential development in	The alternative option would ensure more homes are provided within Ipswich itself.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
To help meet the housing requirements for the whole community		Direct Reversible Medium Certainty	neighbouring authorities	the town centre, Ipswich Village and within the Ipswich Garden Suburb. 13,550 new dwellings are required in Ipswich which represents significant growth. Focussing new housing within the town centre may also help to improve the availability of new high quality housing which may help to improve pockets of existing poor quality homes. The provision of new housing within Ipswich would directly benefit the existing housing stock and may help to reduce the high levels of living environment deprivation within Ipswich. There remains an element of uncertainty as the location of new housing in neighbouring authorities is currently unknown and this may not benefit the housing needs of people wishing to live in Ipswich to the same extent.	However, there may be potential for the types of homes to be affected if higher densities are required, e.g. fewer large family homes. This may result in not all housing needs being met.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS2: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	The policy would encourage sustainable economic growth through its commitment to supporting significant regeneration in Ipswich. Growth proposed within the central areas which are most accessible i.e. the IP One area where a large cluster of employment development is proposed would encourage new business formation and may potentially help to diversify employment opportunities. For these reasons effects have been assessed as positive. With some of the long-term housing need being met outside the borough, some economic benefits may be realised in neighbouring authorities instead.	The alternative option would perform as per the proposed CS2 as the location and amount of employment land would remain the same although any economic benefits of housing growth would be fully realised in Ipswich rather than neighbouring areas. In addition, building at higher densities may mean needs for larger family houses are not met which could affect provision of workforce.
ER5 To support vital and viable	CS2: ++	Short, Medium and Long-term Direct	Borough wide	A key component of the strategy is to develop near to the town and district centres. The policy also seeks to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving	Higher density development near to local centres might help with vitality and viability, however, it is uncertain whether this option might put local services under pressure.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
town, district and local centres		Reversible Medium Certainty		connectivity across Ipswich and locating new development within areas with good transport links. All of which would seek to ensure new development is highly accessible to shops, services and other essential facilities. The Garden Suburb would provide a new local centre which again would ensure new development is accessible to essential facilities. There remains an element of uncertainty as the location of c.4,000 new homes in neighbouring authorities is currently unknown – therefore it is unknown as to how this would affect town, district and local centres outside the borough.	
ER6 To encourage efficient patterns of movement in support of economic growth	CS2: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	The policy seeks to promote growth across Ipswich which may contribute to ensuring there is sufficient land available for business start-ups. The policy also seeks to focus, office, retail, hotel, leisure and educational employment development within defined areas e.g. the town centre, the Waterfront and Ipswich Village all of which have existing good transport links. The Garden Suburb, however, is located further from the town centre where employment is focused. Local facilities would, however, be provided to support this. <i>Addressing need with neighbouring authorities would be uncertain however, could minimise the impact of traffic within Ipswich from future housing growth.</i> <i>Therefore, it will be essential for the council to understand the impacts of traffic and economic growth - and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5 and the</i>	The alternative would perform in a similar way to the Proposed CS2. In addition, higher densities near employment areas may help economic growth through provision of growth, however, higher densities also have the potential to put strain on traffic infrastructure in local areas. It is hard to compare to what might happen in neighbouring areas as we do not know exactly where new housing would be located in those areas.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<i>Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i>	
ER7 To encourage and accommodate both indigenous and inward investment	CS2: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>The policy would encourage and accommodate indigenous and inward investment through its commitment to supporting significant growth (note Policy CS13 seeks to encourage the provision of approximately 12,500 new jobs and provide at least 30ha for employment use) across Ipswich that is focussed largely within the IP One area and the Garden Suburb. The commitment to providing a high quality built environment, promoting the development of multi-functional green infrastructure in urban areas and providing educational facilities may also collectively enhance the reputation of the Ipswich as place people want to live, work and visit.</p> <p>The development of c.4,000 homes outside the borough is less likely to benefit investment within the Ipswich borough boundary itself. However, the provision of c.4,000 new homes outside but around the borough boundary may provide an opportunity to create attractive environments in the Ipswich area.</p>	<p>Securing higher density development may provide for fewer opportunities to incorporate green infrastructure into new development. This can be less appealing to investors.</p> <p>Conversely a bigger employment and customer market would be generated within Ipswich under a higher density option than would be generated by providing for a large proportion of Ipswich's housing needs elsewhere if not around the borough boundary.</p>
CL1 To maintain and improve access to education and skills for both young people and adults	CS2: +	Short, Medium and Long-term Indirect / Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>Improving sustainable access throughout Ipswich may have indirect beneficial effects on this SA Objective as it would indirectly improve access to educational establishments throughout the borough.</p> <p>Focussing office, retail, hotel, cultural and leisure development within the accessible town centre may create opportunities for training for local residents that are within</p>	<p>A bigger employment and customer market would be generated within Ipswich under a higher density option, therefore this is likely to create more opportunities to improve access to skill for young people and adults. However, conversely access to education may be more difficult due to lack of space to provide education opportunities for 4,000 extra households.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<p>accessible locations. However, certainty for this would be low.</p> <p>There remains an element of uncertainty as how access to education would be affected by the 4,000 new homes required in neighbouring authorities.</p>	
<p>CD1</p> <p>To minimise potential opportunities for crime and anti-social activity</p>	CS2: ?	N/A	N/A	<p>Redevelopment of derelict town centre sites has potential to reduce opportunities for crime and anti-social behaviour. Also new development across the borough would be required to meet Policy DM5 which addresses crime and safety.</p> <p>However, on balance, it is not possible to clearly identify if the policy as a whole would significantly affect crime levels.</p> <p>There is an element of uncertainty as the location of new housing in neighbouring authorities is not known – therefore an assessment cannot be undertaken.</p>	<p>There is the potential for higher density development to lead to greater adverse effects on social-cohesion than the proposed CS2. This is because there would be more people living at each development, therefore increasing the chance of potential frictions arising. In addition, an increase in density would result in a reduction in the amount of open space, green infrastructure that could be incorporated into new development. Whether this is positive or negative would depend on how it's designed.</p>

Development of the Strategy

- Policy CS1: Sustainable Development – Climate Change
- Policy CS3: IP-One Area Action Plan
- Policy CS4: Protecting our Assets
- Policy CS5: Improving Accessibility
- Policy CS6: The Ipswich Policy Area

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	CS1: +	Medium and Long-term	Borough wide	<p>Policy CS1 would benefit this SA Objective through its commitment to promoting sustainable transport use and encouraging a 15% modal shift. Reducing the number of private cars on the road over the medium to long term would benefit local air quality.</p> <p>Policy CS3 focusses a large proportion of housing development within the central urban area which is positive in that the area contains the majority of amenities and jobs and is accessible by public transport. However, in spite of this it is also likely that overall vehicle trips in this area will increase which may affect the borough's four designated AQMAs. The provisions of Policy CS1 could help to mitigate this.</p> <p>Policy CS5 directly seeks to improve accessibility throughout the borough on foot, by bicycle and by public transport all of which would contribute to minimising the need to travel by private car over the medium to long term. Again a reduction in the number of private cars on the roads would only benefit local air quality across Ipswich (and potentially the four designated AQMAs).</p> <p>Protecting the borough's built, historical, natural and geological assets under Policy CS4 would not significantly affect this SA Objective. Nor would joint working as promoted in Policy CS6.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.</i></p>
	CS3: -	Direct and Indirect		
	CS4: 0	Reversible		
	CS5: ++	Medium Certainty		
	CS6: 0			
ET2 To conserve soil resources and quality	CS1: 0	Short, Medium and Long-term	Borough wide	<p>Policy CS3 seeks to site new development on previously developed land within the IP One area – this represents a sustainable use of soil resources, therefore effects are scored as positive.</p> <p>Policy CS4 would benefit this SA Objective through its commitment to protecting geodiversity including geological assets which would only benefit soil resources. <i>The beneficial score recorded against Policy CS4 could be</i></p>
	CS3: +	Direct / Indirect		
	CS4: +	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
	CS5: 0	Medium Certainty		<i>strengthened though a direct reference in the policy wording to protecting and enhancing the boroughs soil resource and function.</i>
	CS6: +			Joint working with neighbouring authorities may benefit soil resources through areas of previously developed land for new development being identified in other boroughs over greenfield land.
ET3 To reduce waste	CS1: +	Short, Medium and Long-term	Borough wide	Policy CS1 makes a commitment to ensuring new development incorporates water efficiency measures which would make positive contributions to this SA Objective.
	CS3: 0	Indirect / Direct		Effects have been assessed as major positive against Policy CS4 as the policy seeks to encourage the use of reclaimed, renewable, recycled, and low environmental impact materials in construction. In addition, the policy requires new development to minimise waste generated during construction. All of the above would promote the use of recycled materials in construction, encourage a reduced demand for raw materials and potentially reduce the proportion of waste landfilled.
	CS4: ++	Reversible		Stating the broad nature and location of development together with improving accessibility and promoting joint working as per Policies CS3, CS5 and CS6 would not clearly affect the waste SA Objective.
	CS5: 0	Medium Certainty		
	CS6: 0			
ET4 To reduce the effects of traffic upon the environment	CS1: +	Medium and Long-term	Borough wide	Policy CS1 would directly benefit this SA Objective as its purpose is to promote sustainable development which includes supporting the implementation of ‘Travel to Ipswich’ - this promotes the use of sustainable modes of transport (including walking, cycling and busses) to encourage a 15% modal shift.
	CS3: -	Direct / Indirect		Policy CS3 focusses a large proportion of housing development within the central urban area which is positive in that the area contains the majority of amenities and jobs and is accessible by public transport. However, in spite of this it is also likely that overall vehicle trips in this area will increase. The provisions of Policy CS1 could help to mitigate this.
	CS4: 0	Reversible		The purpose of Policy CS5 is to improve accessibility across the borough in such a way that it minimises the need to travel and encourages journeys by foot, bicycle and by public transport (bus and rail) would promote the use of sustainable travel modes and reduce vehicle movements.
	CS5: +	Medium Certainty		<i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.</i>
	CS6: 0	Policy CS4 and CS6, protecting the borough’s built, historical, natural and geological assets and joint working are unlikely to affect the SA Objective.		
ET5	CS1: 0		Borough wide	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To improve access to key services for all sectors of the population	CS3: +	Short, Medium and Long-term		<p>Policy CS3 would benefit the SA Objective through its commitment to providing new community facilities and new areas of open space within the readily accessible IP-One Area. The policy also promotes the adjacency of new homes to new employment opportunities which again would benefit access to services.</p> <p>Policy CS4 seeks to conserve and enhance Ipswich's natural environment including designating additional Local Nature Reserves and identifying an ecological network across Ipswich linking into adjacent areas – this would contribute to improving access to open space for residents in Ipswich.</p> <p>The focus of Policy CS5 is to facilitate access across Ipswich, particularly via foot, bicycle and by public transport (bus and rail). The policy also makes a specific focus to prioritising the introduction of an integrated cycle network. As the policy would contribute to ensuring new development improves access and seeks to develop new sustainable access within Ipswich, effects have been recorded as major positive.</p> <p>Joint working may help to locate key services / housing to meets needs of people living in border areas.</p>
	CS4: +	Direct / Indirect		
	CS5: ++	Reversible		
	CS6: +	Medium Certainty		
ET6 To limit and adapt to climate change	CS1: ++	Medium and Long-term	Borough wide	<p>Policy CS1 would benefit this SA Objective though its commitment to promoting sustainable transport use and encouraging a 15% modal shift. Reducing the number of vehicle movements over the medium to long term would only reduce carbon emissions from traffic. In addition, a key theme of Policy CS1 is to ensure new development seeks to reduce carbon emissions and tackles the implications climate change in the future. Policy CS1 also seeks to incorporate SuDS where relevant. For these reasons effects have been assessed as major positive.</p> <p>Policy CS3 focusses a large proportion of housing development within the central urban area which is positive in that the area contains the majority of amenities and jobs and is accessible by public transport. However, in spite of this it is also likely that overall vehicle trips in this area will increase and may increase carbon emissions. The provisions of Policy CS1 could help to mitigate this.</p> <p>Policy CS5 directly seeks to improve accessibility throughout the borough on foot, by bicycle and by public transport all of which would contribute to minimising the need to travel by private car over the medium to long term.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.</i></p> <p>Protecting the borough's built, historical, natural and geological assets under Policy CS4 would not affect this SA Objective. Nor would joint working as promoted in Policy CS6.</p>
	CS3: -	Direct / Indirect		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ET7 To protect and enhance the	CS1: +	Short, Medium and Long-term	Borough wide	<p>Policy CS1 would directly benefit the SA Objective through its commitment to supporting the Ipswich Flood Defence Strategy to manage flood risk with in the borough and through its commitment to ensuring new development incorporates water efficiency measures and SuDS as appropriate.</p>
	CS3: +/-	Direct		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
quality of water features and resources and reduce the risk of flooding	CS4: 0 CS5: 0 CS6: 0	Reversible Medium Certainty		Effects have been assessed as both positive and negative against Policy CS3 as it seeks to promote growth within the IP One area, although development on previously developed land may benefit groundwater quality, the policy could result in an increase in the demand for water resources and increase the risk of flooding (particularly as large areas in the IP One area are within Flood Zones 2 and 3). However, the Core Strategy should be read as a whole and the benefits outlined above as per Policy CS1 would offset potential negative effects.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS1: + CS3: + CS4: ++ CS5: + CS6: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Policy CS4 would directly benefit this SA Objective as it seeks to conserve the boroughs natural assets. It also requires new development to conserve and enhance local biodiversity, canopy cover and geodiversity interests as well as protected and priority species. The Policy also seeks to protect the boroughs green infrastructure and designate additional Local Nature Reserves.</p> <p><i>It is noted that there are overlaps between this policy and DM31. Nonetheless, there is considerable scope to expand this policy given its overarching nature at the front of the plan, in particular to protect and enhance the borough's designated natural assets including principally European, National and local level designations. A reiteration of the text in DM31 regarding protection of the European Sites is recommended.</i></p> <p>Policies CS1, CS3 and CS5 seek to provide and protect wildlife corridors along with contributing to creating green infrastructure, all of which would benefit the SA Objective.</p>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS1: 0 CS3: + CS4: ++ CS5: 0 CS6: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Policy CS4 makes a specific commitment to conserving the borough's built and historical assets. The policy goes on to state it would ensure the character and appearance of conservation areas are conserved / enhanced through preparing character appraisals which would only protect and enhance heritage assets and their setting from inappropriate development. The policy seeks the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance as well as taking steps to reduce the number of heritage assets at risk. The policy also includes a cross reference to development management policies which seek to protect / conserve heritage assets (DM8). The policy may also, over the medium to long term, benefit the Gateway to Wolsey's College of St Mary and St Mary at Quay – both listed on Historic England's 2013 'Heritage at Risk Register'.</p> <p>Policy CS3 makes a commitment to creating a heritage assets register within the IP-One Area Action Plan boundary that new development would be required to be mindful of. For this reason effects were recorded as positive as this would contribute to the protection and enhancement of the historic landscape within the defined boundary – which would particularly benefit the town centres Conservation Areas, listed buildings and Scheduled Monuments.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS1: 0 CS3: +/- CS4: ++ CS5: 0 CS6: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Policy CS3 promotes growth within the IP One area which may lead to negative effects on local townscape character, particularly due to the Conservation Areas within the boundary. However, conversely promoting high quality design and potentially developing on derelict sites may lead to beneficial effects on the SA Objective. For these reasons effects have been assessed as both positive and negative. <i>Although it is not the purpose of the policy it should be ensured new development integrates well into the existing townscape, it is therefore recommended that a specific reference to this is included within the policy.</i></p> <p>Policy CS4 would lead to major positive effects on the SA Objective as it directly seeks to protect the built, historical and natural environment of Ipswich. The supporting text clarifies that new development should contribute to local distinctiveness, built form and scale of heritage assets through the use of appropriate design and materials. This policy would help to protect and enhance townscape character and quality across the borough.</p>
HW1 To improve the health of those most in need	CS1: + CS3: + CS4: + CS5: + CS6: 0	Medium and Long-term Direct / Indirect Reversible Low Certainty	Borough wide	<p>Policy CS3 seeks to create new areas of open space within the IP One area which may provide opportunities for recreation and ultimately promote healthy lifestyles – although low certainty improving opportunities for recreation may help to reduce overall high levels of health and disability deprivation particularly within the west of the borough. Focussing development within the town centre could also improve access to healthcare for all.</p> <p>Policies CS1, CS3 and CS5 all seek to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving connectivity across Ipswich and locating new development in areas with good sustainable transport links - again this may offer health benefits.</p> <p>CS4 may offer indirect health benefits through its commitment to supporting the Greenways Project, protecting green spaces and linking ecological networks across the borough.</p>
HW2 To improve the quality of life where people live and encourage community participation	CS1: + CS3: + CS4: + CS5: 0 CS6: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Positive scores have been recorded against Policy CS3 as it will help provide regeneration, new high-quality homes in accessible locations and other amenities.</p> <p>The redevelopment of previously developed urban sites is likely to be positive and in all cases development with positive design and planning within the IP One area could help to improve a sense of community.</p> <p>Policies CS1, CS3 and CS4 also seek to create and improve areas of open space across Ipswich along with ensuring new areas are accessible via foot and bicycle which may provide opportunities for community participation.</p>
ER1	CS1: +		Borough wide	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To reduce poverty and social exclusion	CS3: + CS4: + CS5: + CS6: 0	Short, Medium and Long-term Direct Reversible Medium / Low Certainty		<p>According to the Index of Multiple Deprivation (2010) 26.6% (35,500) of Ipswich's population lives within the most deprived fifth of areas in England, ranking 72 out of 294 local authorities. Nine areas of the town are ranked within the bottom 10% most deprived areas nationally with 7,425 children living in households where no-one works. Promoting growth as per Policy CS3 would contribute to providing better quality new homes together with creating new employment opportunities and improved access to amenities and jobs via sustainable transport modes. This together with safeguarding the Educational Quarter within the town centre would all provide the ingredients to reducing overall deprivation. Policy CS5's commitment to improving sustainable access throughout Ipswich again could help people to access educational facilities and employment – and potentially reduce deprivation.</p> <p>Improving accessibility to areas of open space and creating new areas of open space along with improvements to the boroughs green infrastructure (as per Policies CS1, CS3, CS4 and CS5) may also contribute to reducing overall health and disability deprivation through encouraging healthy lifestyles – although certainty for this is low.</p>
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS1: 0 CS3: + CS4: 0 CS5: + CS6: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	<p>The most deprived area in Ipswich with regards to income and employment is within the town centre or IP One area. Focussing new office, hotel, cultural, leisure and retail – along with educational development within this area may help to alleviate this deprivation. Focussing a proportion of employment development within the town centre may also ensure physical accessibility to new jobs is maximised. This with Policy CS5 that seeks to improve access would benefit access to employment further.</p> <p>Safeguarding the Educational Quarter as outlined within Policy CS3 may also contribute to ensuring people are educated to meet local economic needs although certainty is low.</p> <p>Joint working may help co-locate housing and employment opportunities which may help to enable employment land to be allocated in appropriate locations across the Ipswich Planning Area. For this reason a positive score has been recorded against Policy CS6.</p>
ER3 To help meet the housing requirements for the whole community	CS1: 0 CS3: + CS4: 0 CS5: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Policy CS3 supports the regeneration and sustainable growth of Ipswich town centre through focusing a number of residential developments within the IP One area. Focussing new housing within the town centre may help to improve the availability of new high quality housing which may help to improve pockets of existing poor quality homes. The provision of new housing within Ipswich would directly benefit the existing housing stock and may help to reduce the high levels of living environment deprivation within Ipswich.</p> <p>Joint working is fundamental to future housing delivery to meet Ipswich's needs, and will begin sooner within the plan period therefore a positive score has been recorded for Policy CS6.</p>

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	CS6: +			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS1: 0	Short, Medium and Long-term	Borough wide	CS3 would encourage sustainable economic growth through its commitment to supporting significant regeneration in Ipswich. Growth proposed within the central areas which are most accessible i.e. the IP One area where a cluster of employment development is proposed would encourage new business formation and may potentially help to diversify employment opportunities. Positive effects would be strengthened through Policy CS5s commitment to improving accessibility across the borough, which may also improve access to jobs.
	CS3: +	Direct		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ER5 To support vital and viable town, district and local centres	CS1: +	Short, Medium and Long-term	Borough wide	Policies CS1, CS3 and CS5 all seek to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving connectivity across Ipswich and locating new development within areas with good transport links. All of which would seek to ensure new development is highly accessible to shops, services and other essential facilities. Policy CS3 in particular would benefit the SA Objective as it encourages growth within the central IP One area - proposes a cluster of employment development.
	CS3: ++	Direct		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ER6 To encourage efficient patterns of movement in support of economic growth	CS1: +	Short, Medium and Long-term	Borough wide	Policy CS3 seeks to focus, office, retail, hotel, leisure and educational employment development within the IP One area which benefits from existing good transport links. That said, it will still be important for <i>the council to understand the impacts of traffic and economic growth - and to propose effective measures to mitigate any impacts following the guidance in Policy CS5 and the Travel Ipswich Scheme.</i> Policies CS1 and CS5 both seek to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving connectivity across Ipswich and locating new development within areas with good transport links. All of which would (over time) reduce vehicle movements.
	CS3: +	Direct		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER7 To encourage and accommodate both indigenous and inward investment	CS1: + CS3: + CS4: + CS5: + CS6: +	Short, Medium and Long-term Direct Reversible Medium Certainty	IP One area	All the policies seek to support the development of a high quality built environment which encourages the adjacency of homes and jobs along with promoting the development of multi-functional green infrastructure (and safeguarding the Educational Quarter) and improving transport infrastructure which may enhance the reputation of Ipswich as place people want to live, work and visit.
CL1 To maintain and improve access to education and skills for both young people and adults	CS1: 0 CS3: ++ CS4: 0 CS5: + CS6: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Policy CS3 seeks to safeguard the Education Quarter to support the development of University Campus Suffolk, Suffolk New College and a new primary school which would help to improve the provision of education and training facilities. In addition, locating these facilities in the readily accessible IP –One Area may help to encourage involvement in lifelong learning opportunities and increase educational attainment for all members of society. This would be particularly beneficial within the IP one area as education, skills and training deprivation is considered to be high. Improving sustainable accessibility throughout Ipswich may have indirect beneficial effects on this SA Objective as it would improve access to educational establishments throughout the borough.
CD1 To minimise potential opportunities for crime and anti-social activity	CS1: 0 CS3: ? CS4: 0 CS5: 0 CS6: 0	N/A	N/A	Redevelopment of derelict town centre sites under CS3 has potential to reduce opportunities for crime and anti-social behaviour. Also new development across the borough will also be required to meet secure by design principles which should also deter crime. However, on balance, it is not possible to clearly identify if the policy as a whole would significantly affect crime levels.

Live

- Policy CS7: The Amount of New Housing Required
- Policy CS8: The Balance Between Houses and Flats
- Policy CS9: Previously Developed Land Target
- Policy CS10: Ipswich Garden Suburb (formerly Ipswich Northern Fringe)
- Policy CS11: Gypsy and Traveller Accommodation
- Policy CS12: Affordable Housing

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS7: -	Medium and Long-term	Borough wide and neighbouring authorities	<p>Under CS7, the 7,229²² new homes to be delivered in the borough would increase vehicle movements which may affect local air quality and potentially the four AQMAs. In addition, the amount required on windfall sites and within neighbouring authorities may also affect air quality depending upon their locality, although, without knowing where these could be located there is considerable uncertainty regarding this. However, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is uncertain although anticipated to be negative overall for Policies CS7 and CS10. The level of certainty is recorded as medium / low as the increase in traffic won't necessarily result in a significant adverse effect on air quality, particularly due to the focus in the Core Strategy of improving sustainable transport movements.</p> <p>In relation to CS10 it should be noted that the AQMAs at Norwich Road and Crown Street may potentially be affected by any additional traffic from the Garden Suburb travelling to the town centre. <i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme.</i> Air quality will need to be considered when working with neighbouring authorities to address housing need.</p>
	CS8: 0	Direct / Indirect		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: 0			
	CS12: 0			
ET2	CS7: +/-			

²² Note this figure includes the entire Ipswich Garden Suburb, plus other allocations, plus

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To conserve soil resources and quality	CS8: 0	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>Siting approximately a third of the residual housing on previously developed land as per Policy CS7 represents a sustainable use of soil resources. However, the remainder, particularly those at the Garden Suburb would be on greenfield land and would affect soil resources along with the soil's functionality in those areas. It is not known where the 5,578 required homes (on windfall sites and) within neighbouring authorities would be developed at this stage therefore there remains an element of uncertainty.</p> <p>Policy CS9 represents a sustainable use of soil resources as it commits to ensuring new development is focused on previously developed land which would help to preserve soil resources elsewhere in the borough. This is also true for Policy CS11 as cites a preference to locate gypsy and traveller accommodation on previously developed land.</p>
	CS9: ++	Direct		
	CS10: -	Reversible		
	CS11: +	Medium / Low Certainty		
	CS12: 0			
ET3 To reduce waste	CS7: -	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>The construction of 7,229 new homes within the borough would undoubtedly increase the amount of waste produced. In addition, the amount of new homes required in neighbouring authorities would also increase the amount of waste produced per capita outside of the borough. However, It is recognised that reducing waste is not the focus of Policy CS7, Policy CS1 ensures that new development is developed to minimise waste generation. <i>That said opportunities should be sought (particularly within Policy CS10) to encourage recycling within the new housing developments. Facilities should be provided to encourage reuse/recycling.</i></p> <p>A minor positive score has been assessed against Policy CS11 as it directly seeks to ensure new gypsy and traveller accommodation is capable of being serviced with waste disposal and re-cycling facilities.</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: +			
	CS12: 0			
ET4 To reduce the effects of traffic upon the environment	CS7: -	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>Policy CS7 states that 7,229 new homes are to be developed in the borough. This would therefore increase vehicle trips. In addition, those required on windfall sites and in neighbouring authorities would also increase vehicle movements depending upon their locality. Although, without knowing where these could be located there is considerable uncertainty to what extent. However, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy along with Policy CS10s commitment to improving sustainable access to the Garden Suburb site via walking, cycling and promoting the use of Westfield Station to help alleviate negative effects. The Council will consider the use of compulsory purchase powers where necessary to enable development and infrastructure which could also help to support the SA Objective. This is reiterated in</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS12: 0			<p>the Garden Suburb SPD. At this stage the significance of this is uncertain, however anticipated to be negative overall against Policies CS7 and CS10.</p> <p>Whilst enhancements in public transport provision may be needed at various locations, it is noted in particular that areas around northern Ipswich, Sroughton Road/Jovian Way and the waterfront are currently less well served by public transport.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i></p>
ET5 To improve access to key services for all sectors of the population	CS7: 0	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>The Garden Suburb site, due to its size would be required to provide a new district centre along with two local centres providing new residents with a range of essential facilities (including schools, a supermarket, employment development and open space). This would ensure new development maintains and improves access to essential services and facilities. The provision of new services would also guard against putting existing services under pressure. The Council will consider the use of compulsory purchase powers where necessary to enable development and infrastructure which would also contribute towards improving access to key services.</p> <p>Policy CS11 would ensure any new gypsy and traveller accommodation is located (where possible) within 1km of basic services including the public transport network, along with being accessible safely on foot, by bicycle and by vehicle. As the policy seeks to ensure pitch provision is accessible to essential services effects are assessed as positive.</p>
	CS8: 0	Direct / Indirect		
	CS9: 0	Reversible		
	CS10: +	High / Medium Certainty		
	CS11: +			
	CS12: 0			
ET6 To limit and adapt to climate change	CS7: -	Medium and Long-term	Borough wide and neighbouring authorities	<p>Policy CS7 states that 7,229 new homes are to be developed in the borough. This would therefore increase vehicle movements across the borough and may increase carbon emissions. In addition, those required on windfall sites and in neighbouring authorities would also increase vehicle movements and carbon emissions depending upon their locality. Although, without knowing where these could be located there is considerable uncertainty to what extent. It should be noted that a significant emphasis has been placed on promoting sustainable travel within the Core Strategy along with Policy CS10s commitment to improving sustainable access to the Garden Suburb site via walking, cycling and promoting the use of Westfield Station which would help to alleviate negative effects. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is uncertain, however anticipated to be negative overall against Policies CS7 and CS10.</p>
	CS8: 0	Direct / Indirect		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS12: 0			<i>It will be essential for planning applications to thoroughly assess the impacts of traffic and increases in carbon emissions from transport and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i>
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS7: -	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>The significant amount of new homes required in the borough (CS7) would only increase the demand for water resources. In addition, the significant amount of new homes proposed could also exacerbate existing flooding issues on land adjacent to the River Orwell, the River Gipping and Belstead Brook.</p> <p>The Garden Suburb is located on greenfield land which may affect local ground water quality through runoff. However, it should be noted only the small watercourse located within the northern part of the Garden Suburb is considered by the Environment Agency to be at risk of flooding. Although negative effects have been recorded for Policies CS7 and CS10, it is appreciated that the issue of flooding and water efficiency is covered elsewhere within the Core Strategy.</p> <p>With regards to Policy CS7 there remains an element of uncertainty as the location of a significant number of new homes in neighbouring authorities is not known - therefore effects on ground water quality, resources and flood risk cannot be assessed.</p> <p>Policy CS11 ensures that gypsy and traveller accommodation is not located within areas that are at risk of flooding. Therefore beneficial effects have been recorded.</p> <p>Seeking to locate development on previously developed land as per Policy CS9 in the first instance would seek to guard against ground water contamination on greenfield sites. However, it should be noted there is insufficient brownfield land to meet housing requirements.</p>
	CS8: 0	Direct		
	CS9: +	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: +			
	CS12: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions	CS7: +/-	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>The proposed 7,229 new homes in Ipswich including the significant amount being constructed on the greenfield Garden Suburb site (as per Policy CS10) is likely to result in a loss of wildlife habitat. However, Policy CS10 seeks to create new areas of open space, including a 24.5ha (minimum) county park which could help to mitigate adverse effects on biodiversity resources. The Core Strategy's overarching commitment to link ecological networks and green corridors across Ipswich could also provide further mitigation.</p> <p>Although the Garden Suburb site takes up a lot of greenfield land, it is worth noting that it isn't covered by any statutory ecological designations.</p>
	CS8: 0	Direct		
	CS9: +	Reversible		
	CS10: +/-	Medium / Low Certainty		
	CS11: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
on SSSIs, SPAs and SACs	CS12: 0			<p>In addition to the above there remains an element of uncertainty against the SA Objective as the locations of new homes proposed in neighbouring authorities are unknown – therefore effects on biodiversity resources cannot be assessed.</p> <p>Policy CS9 seeks to develop previously developed land in the first instance, which may protect some green field sites from development. However, it should be noted that some brownfield sites can also be rich in wildlife.</p> <p>Policy CS11 commits to ensure new gypsy and traveller accommodation is not sited where it could potentially affect sites of nature conservation importance. This would be particularly beneficial given the boroughs (although fairly urban) number of SSSIs, LNRs and the Stour and Orwell Estuaries SPA and Ramsar site.</p> <p>The Habitats Regulations Assessment considered that there is the potential for likely significant effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies, in relation to housing growth proposed under policies CS7 and CS10. Effects would relate to recreational disturbance. However, an appropriate assessment was undertaken and mitigation measures set out which would mitigate these effects. These mitigation measures have been incorporated in the Core Strategy where relevant, including the provision of a country park as part of the Ipswich Garden Suburb development. The appropriate assessment therefore concluded that there would be no adverse effect on the integrity of European Sites from the Core Strategy and Policies DPD Review.</p>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS7: ?	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>Effects were recorded as uncertain against Policies CS7 and CS10 as whilst no known heritage assets are anticipated to be directly affected, new residential development has the potential to adversely affect the setting of these assets if inappropriate. Conversely, high quality residential development near to a heritage asset that complements it or improves an existing poor quality site may benefit its setting. Without knowing these local details at this stage it is not possible to make an accurate assessment against this objective. In addition, new homes could also affect unknown archaeological remains although this is also uncertain. There also remains further uncertainty with regards to Policy CS7 as the location of new housing in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown – therefore effects on heritage assets outside the borough are unknown.</p> <p>Positive scores were recorded against Policy CS11 as the policy ensures that new gypsy and traveller pitch provision does not have a significant effect on conservation areas. <i>The positive score could be strengthened though removing the reference to conservation areas and historic sites in clauses ii and iii respectively and adding a new clause that states 'heritage assets'.</i></p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: ?	Medium / Low Certainty		
	CS11: +			
	CS12: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS7: +/-	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>Policy CS7 commits to the provision of 7,229 new homes within Ipswich and within the Garden Suburb site (Policy CS10). New residential development on derelict sites within the central urban areas could improve the existing townscape. However, development within the Garden Suburb site would result in the removal of a large area of undeveloped land at the urban fringe which would negatively affect landscape character. It should be noted that Policy CS10 does provide some mitigation, such as ensuring development provides tree planting, new areas of open space and urban greening schemes. Although it is concluded that even with the mitigation built into Policy CS10 the overall effect on landscape would be negative.</p> <p>There also remains further uncertainty with regards to Policy CS7 as the location of new housing in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown – therefore effects on landscape / townscape character outside the borough are unknown.</p> <p>Positive scores were recorded against Policies CS9 and CS11 as the preference to develop previously developed land in the first instance may improve the appearance of some derelict sites in the town centre. In addition, Policy CS11 makes a commitment to ensuring new pitch provision is proportionate in size to nearby settlements, does not impact on the appearance and character of the open countryside and does not affect sites designated for their landscape qualities.</p>
	CS8: 0	Direct		
	CS9: +	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: +			
	CS12: 0			
HW1 To improve the health of those most in need	CS7: +	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>Policy CS10 seeks to create new areas of open space throughout the Garden Suburb along with a 24.5ha (minimum) country park which would provide opportunities for recreation and may encourage people to lead healthy lifestyles. This together with the creation of replacement playing fields may help to reduce overall high levels of health and disability deprivation within Ipswich. Policy CS10 also seeks to provide a health centre within the Garden Suburb. It is worth noting that the Garden Suburb would also create accessible formal open space as currently it is just agricultural fields. Conversely, some indirect negative effect may arise associated with deterioration of the air quality in the north part of the borough.</p> <p>Focussing housing development near to centres could also improve access to healthcare for all.</p> <p>There remains an element of uncertainty under CS7 as the location of the additional new homes required in neighbouring authorities is unknown.</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: +/-	Medium / Low Certainty		
	CS11: 0			
	CS12: 0			
HW2 To improve the quality of	CS7: +/-	Short, Medium and Long-term	Borough wide and neighbouring authorities	New residential development is likely to add to current noise and light pollution, particularly at the Garden Suburb. On smaller, infill sites this is less likely to be significant – i.e. within the town centre.
	CS8: 0	Direct		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
life where people live and encourage community participation	CS9: 0 CS10: +/- CS11: + CS12: 0	Reversible Medium / Low Certainty		Residential development on previously developed urban sites is likely to be positive and in all cases development with positive design and planning around district centres could help to improve a sense of community. The Council will consider the use of compulsory purchase powers where necessary to enable development and infrastructure, which could also make contributions towards achieving the SA Objective. There remains an element of uncertainty regarding the additional homes required in neighbouring authorities as their locations are unknown. Policy CS11 makes a direct commitment to ensuing new gypsy and traveller sites are proportionate in size and support community cohesion.
ER1 To reduce poverty and social exclusion	CS7: + CS8: 0 CS9: 0 CS10: + CS11: 0 CS12: ++	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	According to the Index of Multiple Deprivation (2010) 26.6% (35,500) of Ipswich's population lives within the most deprived fifth of areas in England. Promoting significant residential development as per Policy CS7 would contribute to providing better quality new homes, which may help to address existing living environment deprivation – particularly within the IP One area. This together with improving the availability of affordable new homes (Policy CS12) would benefit the SA Objective further through potentially reducing homelessness. The provision of new decent family homes at the Northern Fringe (– although not a deprived area) on the whole may reduce deprivation levels at a borough level. There remains an element of uncertainty as the location of residential development in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown. Therefore it is unknown as to whether it would benefit this SA Objective.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS7: 0 CS8: 0 CS9: 0 CS10: + CS11: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Garden Suburb	Policies CS7, CS8, CS9, CS11 and CS12 all largely relate to housing provision and a preference to develop on previously developed land within the borough. Therefore these policies are unlikely to offer any benefits to the SA Objective. Policy CS10 may contribute, in a relatively minor way, to reducing unemployment and improving accessibility to new jobs within the Garden Suburb through the commitment to non-residential uses which will lead to job creation.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS12: 0			
ER3 To help meet the housing requirements for the whole community	CS7: ++	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The provision of 7,229 new homes (Policy CS7) in the borough, including a significant proportion in the Garden Suburb (Policy CS10) would contribute to ensuring there is sufficient housing to meet identified needs in all areas. In addition, although not the focus of the policy housing would be of a high quality which would only help to reduce high levels of living environment deprivation within the town centre. The commitment to provide a balance between flats and houses (Policy CS8) along with ensuring the provision of affordable new homes (Policy CS12).</p> <p>New gypsy and traveller pitch provision (Policy CS11) would also ensure all sectors of society are catered for with regards to housing requirements.</p> <p>There remains an element of uncertainty as the location of new housing in neighbouring authorities is currently unknown.</p> <p>It is also noted that under CS10 the Council will consider using its compulsory purchase powers, where necessary, in order to enable comprehensive development and infrastructure delivery to take place which could contribute positively to enabling growth.</p>
	CS8: +			
	CS9: 0			
	CS10: ++			
	CS11: ++			
	CS12: ++			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS7: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Garden Suburb	<p>Policies CS7 and CS10 may benefit the SA Objective indirectly through meeting the demand of housing and providing opportunities for the borough to grow and develop. Investment in residential developments would create a number of temporary jobs but also may also attract further inward investment by becoming a better place to live.</p> <p>Policy CS10 may also contribute to reducing employment and improving accessibility to new jobs within the Garden Suburb through the commitment to creating new jobs within the new district centre and two new local centres (retail, leisure, A1, A2-A5, schools and a health centre) along with jobs. However, it should be noted that effects would be minor as employment provision will be focused within the town centre / IP One area. It is also noted that the Council will consider using its compulsory purchase powers, where necessary, in order to enable comprehensive development and infrastructure delivery to take place which could contribute positively to enabling growth.</p>
	CS8: 0			
	CS9: 0			
	CS10: +			
	CS11: 0			
	CS12: 0			
ER5 To support vital and	CS7: +	Short, Medium and Long-term Direct	Garden Suburb	It is considered that the influx of new residents in Ipswich associated with Policy CS7 would have a positive effect on existing town and district centres. Therefore effects have been assessed as positive.
	CS8: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
viable town, district and local centres	CS9: 0 CS10: + CS11: 0 CS12: 0	Reversible Medium Certainty		Policy CS10 would contribute to maintaining and improving access to shops, services and facilities within the Garden Suburb. The Garden Suburb would provide a new district centre and two new local centres which would provide new retail, leisure, health and educational facilities.
ER6 To encourage efficient patterns of movement in support of economic growth	CS7: 0 CS8: 0 CS9: 0 CS10: + CS11: 0 CS12: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Garden Suburb	<p>Policies CS7, CS8, CS9, CS11 and CS12 all largely relate to housing provision and a preference to develop on previously developed land within the borough. Therefore these policies are unlikely to offer any benefits to this economic SA Objective.</p> <p>Policy CS10 may contribute to ensuring there is sufficient land, buildings and premises available for business start-ups within the Garden Suburb through its commitment to providing a new district centre and two new local centres which will contain new retail, leisure, A1, A2-A5 premises. Policy CS10 also ensures that any planning applications that come forward for the Garden Suburb are supported by an Infrastructure Delivery Plan and also meet criteria outlined in the Garden Suburb development brief SPD which would only ensure infrastructure (including transport) meet the needs of the local area.</p>
ER7 To encourage and accommodate both indigenous and inward investment	CS7: + CS8: 0 CS9: 0 CS10: + CS11: 0	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	The SA Objective would be indirectly achieved through CS7 through meeting the demand for housing and providing opportunities for the borough to grow and develop. Investment in residential developments would also create a number of temporary jobs but may also attract further inward investment by becoming a better place to live. The significant number of new properties proposed to be constructed in the borough (outlined in CS7 and CS10) may contribute to the development of a high quality built environment, particularly within the Garden Suburb where a new district centre would be developed. This with the provision of multi-functional green infrastructure and the new educational facilities may also collectively enhance the reputation of the Ipswich as place people want to live, work and visit.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS12: 0			
CL1 To maintain and improve access to education and skills for both young people and adults	CS7: 0	Medium and Long-term	Garden Suburb	The implementation of Policy CS10 has the potential to improve educational attainment through the provision of a new high school and three primary schools. However, it is uncertain whether the overall educational attainment would be improved significantly as other factors also influence the level of skills and qualifications.
	CS8: 0	Direct / Indirect		
	CS9: 0	Reversible		
	CS10: +	Low Certainty		
	CS11: 0			
	CS12: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	CS7: 0	N/A	N/A	Crime rates are higher than national average within Ipswich with high records of organised crime and hate crime amongst others. An influx of new residents could potentially result in an increase in thefts in the short term, however, this not the only factor that contributes to an increase of crime levels – for this reason effects have been recorded as neutral.
	CS8: 0			
	CS9: 0			
	CS10: 0			
	CS11: 0			
	CS12: 0			

Work

- Policy CS13: Planning for Jobs Growth
- Policy CS14: Retail Development and Main Town Centre Uses

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS13: +/-	Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	<p>Although reducing traffic movements is not the focus Policies CS13 and CS14 encouraging the provision of 12,500 new jobs in the borough would inevitably increase vehicle movements (particularly within the town centre) which may affect local air quality and potentially the four AQMAs. However, it is worth noting that, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD, Travel Ipswich and Policy CS5.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme.</i></p>
	CS14: +/-			
ET2 To conserve soil resources and quality	CS13: +/-	Short, Medium and Long-term Direct Irreversible Medium Certainty	Borough wide	<p>Largely encouraging employment, retail and town centre use development within Ipswich town centre, within existing employment sites and at Futura Park would represent a sustainable use of soil resources, as associated new employment development would be on previously developed land. However, some provision would be within the Garden Suburb, therefore on greenfield land – this would affect soil resources along with the soil's functionality in the area.</p>
	CS14: +			
ET3 To reduce waste	CS13: -	Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Although not the focus of Policy CS13 or Policy CS14 encouraging significant growth through the provision of 12,500 new jobs would inevitably increase waste production in the borough. <i>However, this could be partially mitigated though Policy CS4s commitment to ensuring new development is required to minimise the amount of waste generated during construction and through the lifetime of the buildings.</i></p>
	CS14: -			
ET4	CS13: +/-		Borough wide	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To reduce the effects of traffic upon the environment	CS14: +/-	Medium and Long-term Indirect Reversible Medium Certainty		<p>Although reducing traffic movements is not the focus Policies CS13 and CS14 encouraging the provision of 12,500 new jobs in the borough period would inevitably increase vehicle movements (particularly within the town centre). However, it is worth noting that, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD, Travel Ipswich and Policy CS5.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme.</i></p>
ET5 To improve access to key services for all sectors of the population	CS13: +	Short, Medium and Long-term	Town Centre	Policies CS13 and CS14 would benefit the SA Objective through focussing new employment, retail and town centre use provision largely within the accessible the town centre which would only benefit access to services.
	CS14: +	Indirect Reversible Medium Certainty		
ET6 To limit and adapt to climate change	CS13: +/-	Medium and Long-term	Borough wide	<p>Although reducing traffic movements is not the focus Policies CS13 and CS14 encouraging the provision of 12,500 new jobs in the borough would inevitably increase vehicle movements and associated carbon emissions (particularly within the town centre). However, it is worth noting that, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD, Travel Ipswich, Policy CS5 and Policy DM17. In addition, Policy CS14 would encourage linked trips.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic (and associated increases in carbon emissions) and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme.</i></p>
	CS14: +/-	Indirect Reversible Medium Certainty		
ET7	CS13: +/-			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS14: +/-	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Largely within the town centre.	<p>The purpose of Policies CS13 and CS14 is to encourage economic growth across Ipswich rather than conserving water resources and reducing flood risk. However, it should be noted that Policy CS13 commitment to encouraging 12,500 new jobs is likely to increase the demand for water resources over the medium to long term. Focussing job provision within the town centre would maximise development on previously developed land which would result in positive effects on this SA Objective by conserving permeable greenfield land. Employment development at the Garden Suburb would be located on greenfield land which could affect local ground water quality through runoff.</p> <p><i>With regards to flooding, it should be ensured that the allocated 30ha (minimum) of new employment development is outside flood zones 2 and 3.</i></p>
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS13: +	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Largely within the town centre.	<p>Policy CS13 and CS14 seek to focus the majority of employment development on previously developed land in the first instance, which may protect some greenfield sites from development. However, it should be noted that some brownfield sites can also be rich in wildlife. Policy CS14 also seeks to provide urban greening within the town centre which may offer biodiversity benefits.</p> <p>The Appropriate Assessment has concluded no adverse effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.</p> <p><i>It should be ensured that the 30ha (minimum) of new employment allocations are located away from statutory designated sites along with areas with high biodiversity. However, Policy DM31 would help to mitigate for this.</i></p>
	CS14: +			
ET9	CS13: ?			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To conserve and where appropriate enhance areas and sites of historical importance	CS14: ?	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Largely within the town centre and Garden Suburb.	Effects were recorded as uncertain as whilst no known heritage assets are anticipated to be directly affected, new employment development has the potential to adversely affect the setting of assets if inappropriate. Conversely, a high quality development near to a heritage asset that complements it or improves an existing poor quality site may benefit its setting. Without knowing these local details at this stage it is not possible to make an accurate assessment against this objective. In addition, development could also affect unknown archaeological remains although this is also uncertain. The purpose of this policy is not to seek to protect heritage assets, this is provided in DM8.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS13: +/-	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Largely within the town centre and Garden Suburb.	Policies CS13 and CS14 largely promote economic growth within the town centre which may lead to negative effects on local townscape character, particularly due to the Conservation Areas within the boundary. However, conversely promoting development that is of a scale appropriate to the size, function and catchment may offer some beneficial effects on the SA Objective. In addition to promoting economic growth in the town centre Policy CS13 would also lead to some development in the Garden Suburb which would result in a loss of agricultural fields, it is likely that this would result in adverse effects on the local landscape quality. For the reasons above effects have been assessed as both positive and negative. <i>It should be ensured that the 30ha (minimum) of new employment allocations are well integrated into the existing environment -NB this is provided in Policy DM5.</i>
	CS14: +/-			
HW1 To improve the health of those most in need	CS13: +	Medium and Long-term	Town Centre	The policies commitment to largely focussing employment, retail and town centre use development within the accessible town centre may help to encourage healthy lifestyles. In addition, creating more employment opportunities in the borough and may improve overall mental health and overall deprivation.
	CS14: +	Indirect Reversible Low Certainty		
HW2	CS13: +		Town Centre	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To improve the quality of life where people live and encourage community participation	CS14: +	Medium and Long-term Indirect Reversible Low Certainty		The policies may indirectly contribute to the achievement of the SA Objective through supporting the growth of educational facilities and initiatives to improve skills and qualifications levels. The level of educational attainment is low and the local partnerships may have a positive effect on the comprehensive development of the borough and the quality of life. In addition, the cumulative effect of concentrating employment development along with residential development (proposed in Policies CS2 and CS7) within the town centre and the Garden Suburb are likely to increase noise and light pollution within these areas.
ER1 To reduce poverty and social exclusion	CS13: +	Short, Medium and Long-term	Town Centre	Encouraging 12,500 jobs to be created in the borough along with focussing economic development within the accessible town centre would provide the foundation to improve existing high levels of income and employment deprivation within the town centre.
	CS14: +	Direct Reversible Medium Certainty		
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS13: ++	Short, Medium and Long-term	Town Centre	As above, encouraging the creation of 12,500 jobs along with focussing economic development within the accessible town centre would provide the foundations to improve existing high levels of income and employment deprivation along with reducing unemployment within an area most at need.
	CS14: +	Direct Reversible Medium Certainty		
ER3	CS13: 0	N/A	N/A	There is no clear link between the Policies and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To help meet the housing requirements for the whole community	CS14: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS13: ++	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Policies CS13 and CS14 would encourage new business formation and ensure there is sufficient land, buildings and premises available to accommodate business start-ups through allocating land for employment use, protecting land in existing employment areas and allocating land for other employment generating uses. The commitment to encouraging the provision of 12,500 new jobs would also contribute to encouraging economic growth and diversifying employment opportunities within the borough.
	CS14: +			
ER5 To support vital and viable town, district and local centres	CS13: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Town Centre and district / local centres	Policy CS14 would directly benefit the SA Objective as it seeks to enhance the role, vitality and viability of the Ipswich Central Shopping Area. In addition, focussing new economic development within the town centre (Policies CS13 and CS14) would concentrate new facilities including a mix of retail units within an area that already benefits from good sustainable access.
	CS14: ++			
ER6	CS13: +		Town Centre	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To encourage efficient patterns of movement in support of economic growth	CS14: +	Short, Medium and Long-term Direct Reversible Medium Certainty		<p>Policies CS13 and CS14 seek to ensure sufficient land, buildings and premises are available to accommodate business start-up and growth through the commitment to allocate a minimum of 30ha for employment use. The policies also promote the use of sustainable travel modes through largely focussing new employment development within the accessible town centre, over time this may reduce dependence on the private car.</p> <p>Although not the focus of the policy <i>it will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme.</i></p>
ER7 To encourage and accommodate both indigenous and inward investment	CS13: +	Short, Medium and Long-term	Town Centre and employment allocations	<p>Policies CS13 and CS14 would encourage inward investment and new business formation through the commitment to encouraging 12,500 new jobs, allocating a minimum of 30ha for employment development and protecting land for employment in existing employment use.</p> <p>Policy CS14 also seeks to ensure new town centre and retail development provides environmental enhancements along with urban greening which may contribute to the development of multi-functional green infrastructure in urban areas.</p> <p>Collectively the above may help to enhance the reputation of urban areas as place to live, work and visit.</p>
	CS14: +	Direct / Indirect Reversible Low certainty		
CL1 To maintain and improve access to education and skills for both young people and adults	CS13: +	Medium and Long-term	Borough wide	<p>The implementation of Policies CS13 and CS14 have the potential to improve educational attainment through the strategic provision of new schools and create new opportunities to improve skills therefore effects have been assessed as positive.</p>
	CS14: +	Direct / Indirect Reversible Low certainty		
CD1	CS13: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To minimise potential opportunities for crime and anti-social activity	CS14: 0			

Learn

- Policy CS15: Education Provision

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS15: +	Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	The provision of educational facilities in accessible locations would contribute towards reducing reliance on private vehicles and encouraging the use of sustainable modes of transport such as walking which would indirectly help to make some contributions towards improving air quality.
ET2 To conserve soil resources and quality	CS15: +/-	Medium and Long-term Direct Reversible and Irreversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	Ipswich is predominantly urban with the Garden Suburb greenfield agricultural land. The provision of educational facilities at existing sites such as Suffolk New College and University Campus Suffolk as well as the development and safeguarding of land for educational use would support the SA Objective by providing facilities on previously developed land. Development within the Garden Suburb would result in the loss of greenfield land and soil resources which would not support the SA Objective.
ET3 To reduce waste	CS15: -	Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	New educational facilities in the long term would increase waste production. <i>New development should be required to minimise the amount of waste generated during construction and through the lifetime of the building.</i>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET4 To reduce the effects of traffic upon the environment	CS15: +	Medium and Long term Indirect Reversible Medium Certainty	Areas surrounding Suffolk New College and University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The policy seeks to provide new educational facilities in accessible locations which in the long term would help to reduce the effects of traffic upon the environment by reducing reliance on private cars and encouraging walking, cycling and public transport. <i>It is recommended that the policy should be linked to Travel Ipswich.</i>
ET5 To improve access to key services for all sectors of the population	CS15: +	Medium and Long term Indirect Reversible Medium Certainty	Areas surrounding Local Centres, District Centres and schools identified for development	The policy seeks to provide schools in sustainable locations and to provide nursery and children's centres within or adjacent to local and district centres or co-located within schools in order to facilitate linked trips by parents. These provisions would help to improve access to these facilities for communities.
ET6 To limit and adapt to climate change	CS15: +	Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The provision of new educational facilities in accessible locations including additional nursery and children's centres within or adjacent to district and local centres would contribute towards reducing reliance on private cars and increase the use sustainable modes of travel such as walking, cycling and public transport. <i>It is recommended that new educational development should meet BREEAM standards.</i>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS15: 0	N/A	N/A	The policy is not considered to have any significant effect on protecting and enhancing the quality of water features. It is noted that development however in the long term would see an increase in water use though not to a level that is considered to be significant level.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS15: +/-	Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	New educational development could affect biodiversity resources across the borough. However, new educational development within the IP One area is likely to utilise previously developed land which would protect greenfield sites. However, the provision of three primary schools and a secondary school within the Garden Suburb on greenfield land would result in the loss of wildlife habitats. Although it should be noted that the Garden Suburb is not covered by any statutory ecological designations. Mitigation measures such as soft landscaping, improvements to green infrastructure / wildlife corridors and the provision of a country park within the Garden Suburb would only help to reduce negative impacts to biodiversity.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS15: ?	Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	There are conservation areas, Scheduled Monuments, listed buildings and other heritage assets across Ipswich which could be affected by the development of new educational facilities however this would be dependent upon the location of sites which will be selected for development and safeguarding through the Site Allocations DPD (Incorporating IP-One Area Action Plan). Development could affect the setting of these features if located in close proximity. There is also potential to uncover previously undiscovered archaeological remains during construction activities. This policy could include a cross reference to policies CS4 and DM8 in order to encourage new development to protect heritage features. <i>Policy DM8 ensures that land identified for educational use that is close to heritage assets such as listed buildings or Conservation Areas is developed sensitively and in keeping with local townscape character.</i>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS15: +	Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	Development of educational facilities could support the SA Objective by using high quality design that ensures new educational development complements and enhances the character and quality of the local townscape – this would be particularly true within the IP One area if derelicts sites are redeveloped.
HW1 To improve the health of those most in need	CS15: +	Long term Indirect Reversible Low Certainty	Areas surrounding Suffolk New College, University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The provision of educational facilities in accessible locations would partially help to support the SA Objective through encouraging people to walking / cycle to school.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
HW2 To improve the quality of life where people live and encourage community participation	CS15: +	Medium and Long term Indirect Reversible Low Certainty	Areas surrounding Suffolk New College, University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The policy seeks to encourage the use of educational facilities for community uses out of hours. This would encourage people to make use of these facilities during previously unavailable hours which would help to improve quality of life and encourage community participation.
ER1 To reduce poverty and social exclusion	CS15: +	Medium and Long term Indirect Reversible Low Certainty	Areas surrounding Suffolk New College, University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The policy seeks to encourage the use of educational facilities for community uses out of hours. This would help to partially support the reduction of social exclusion as it would help to encourage people within the community to engage with each other and make use of the facilities available.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS15: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The development of educational facilities would create construction jobs and elementary jobs though this would not be to a significant level. There would be opportunities provided for employment including teaching jobs.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER3 To help meet the housing requirements for the whole community	CS15: 0	N/A	N/A	The policy is not considered to have any significant effect on helping to meet the housing requirements for the whole community.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS15: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER5 To support vital and viable town, district and local centres	CS15: +	Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The development of additional nursery and children's centres located adjacent to Local and District Centres will help to support the vitality and viability of the centres. The developments at Suffolk New College and University Campus Suffolk will also help to support the future wellbeing and prosperity of Ipswich.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER6 To encourage efficient patterns of movement in support of economic growth	CS15: 0	N/A	N/A	There is no clear relationship between the policy and the SA Objective.
ER7 To encourage and accommodate both indigenous and inward investment	CS15: +	Medium and Long term Indirect Reversible Low Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The provision of educational facilities in accessible locations including Local and District Centres would help to support the vitality and viability of these areas and would help to support the reputation of urban areas as places to live, work and visit which in turn would make contributions towards encouraging and accommodating both indigenous and inward investment. Further education establishments are often regarded as positive hubs of the knowledge industry and can attract wider businesses to locate near them. Having a well-educated workforce may also contribute towards this SA Objective.
CL1 To maintain and improve access to education and skills for both young people and adults	CS15: ++	Medium and Long term Indirect Reversible High Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	Land identified for further development of educational facilities will be safeguarded through the Sites DPD (Incorporating IP-One Area Action Plan). This includes new primary school provision all of which in the medium to long term will help to improve access to education and skills for both young people and adults. The provision of additional nursery and children's centres within or adjacent to District and Local Centres or co-located within schools will also help to improve access to educational facilities. Educational use land safeguarded through policy CS10 at Ipswich Garden suburb will help to support the SA Objective in the long term. <i>It is recommended that the policy should refer to safeguarded land being accessible by sustainable transport.</i>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
CD1 To minimise potential opportunities for crime and anti-social activity	CS15: 0	N/A	N/A	Whilst university campuses can sometimes be hotspots for petty-crime it should be possible to mitigate this through design features. On balance, the policy is not considered to have any significant effect on minimising potential opportunities for crime and antisocial activity.

Play

- Policy CS16: Green Infrastructure, Sport and Recreation

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS16: +	Short, Medium and Long term Indirect Reversible Low Certainty	Borough wide	The policy seeks to enhance and extend the ecological network and green corridors and open spaces. It requires that all new development contributes to the provision of open space. The policy also seeks to improve green infrastructure and to connect radial networks including the publically accessible green rim around Ipswich. All of these provisions will make minor contributions towards improving air quality because they will encourage sustainable travel across these networks.
ET2 To conserve soil resources and quality	CS16: +	Medium and Long term Direct and Indirect Reversible Medium Certainty	Borough wide	The policy seeks to enhance and extend the ecological network and green corridors and open spaces. These elements of the policy would help to maintain soil quality as they would be protected from development.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET3 To reduce waste	CS16: 0	N/A	N/A	The policy is not considered to have any significant effect on reducing waste.
ET4 To reduce the effects of traffic upon the environment	CS16: +	Medium and Long term Indirect Reversible Low Certainty	Borough wide	The policy seeks to enhance and extend the ecological network and green corridors and open spaces. The policy seeks to improve green infrastructure provision and to link radial networks including the publically accessible green rim around Ipswich. All of these provisions will make minor contributions towards reducing effects of traffic upon the environment by encouraging more sustainable movement across networks.
ET5 To improve access to key services for all sectors of the population	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	Ipswich Borough Council seek to work with partners in order to improve green infrastructure provision whilst linking radial ecological networks and green corridors with a publicly accessible green rim around Ipswich. The policy also seeks to extend the country park and promote improved access to recreational and sports facilities all of which will help to improve sustainable access within the Borough to key services and open spaces.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET6 To limit and adapt to climate change	CS16: +	Short, Medium and Long term Indirect Reversible Low Certainty	Borough wide	The policy seeks to provide green infrastructure across the borough which would help to improve air quality by encouraging sustainable travel such as walking and cycling. This would help to limit emissions and would contribute to limiting and adapting to climate change. The provision of green infrastructure would also help to maintain flood plain and permeable green areas which would contribute to adapting to climate change.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS16: +	N/A	N/A	The provision of green infrastructure could provide opportunities to incorporate SuDs features and it may also be possible that in some cases green spaces coincide with flood zones. Also green infrastructure in itself would be permeable and hence would help to reduce flood risk. This would offer some benefits to reducing the impact of flooding.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS16: ++	Short, Medium and Long term Indirect Reversible High Certainty	Borough wide	The policy seeks to safeguard, protect and enhance biodiversity and the environment and in particular seeks to reduce the impacts on birds in the Orwell Estuary SPA through a management plan for Orwell Country Park which would help to protect wildlife within the designated site. The policy requires major development to include on-site public space, wildlife habitat and networks connecting to existing ecological networks where they exist close to the proposed development. All of this would help to conserve and enhance biodiversity.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The provision of accessible and well-designed green infrastructure across the borough including the publicly accessible green rim, a new country park and visitor centre within the Ipswich Garden Suburb and an extension to Orwell Country Park and possible provision of a visitor facility would each contribute towards conserving and enhancing the quality and local distinctiveness of landscapes and townscapes.
HW1 To improve the health of those most in need	CS16: +	Short, Medium and Long term Indirect Reversible Low Certainty	Borough wide	The provision of safe accessible open spaces, sport and recreational facilities would encourage healthy lifestyles which would contribute to the achievement of this SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
HW2 To improve the quality of life where people live and encourage community participation	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The provision of safe and freely accessible open spaces, sport and recreational facilities will help to encourage community participation. They would also help to protect residents from amenity pollution and noise and light pollution which would contribute towards improving the quality of life where people live.
ER1 To reduce poverty and social exclusion	CS16: 0	N/A	N/A	The policy encourages healthier lifestyles through the provision sustainably accessible open spaces, recreational and outdoor facilities. This may help to reduce high levels of health and disability deprivation however it is not considered that this would be to a significant level.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER3 To help meet the housing requirements for the whole community	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.
ER5 To support vital and viable town, district and local centres	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The policy seeks to ensure that green spaces are well designed, well managed and freely accessible. Providing green spaces in locations which would also help to improve access to shops, services and facilities across the Borough which would benefit communities and would support the vitality and viability of District and Local Centres.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER6 To encourage efficient patterns of movement in support of economic growth	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.
ER7 To encourage and accommodate both indigenous and inward investment	CS16: +	Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The provision of new green infrastructure and open spaces and management plans for these areas would help to improve the image and reputation of local areas as places to live, work and visit which would make contributions towards encouraging and accommodating both indigenous and inward investment.
CL1 To maintain and improve access to education and skills for both young people and adults	CS16: 0	N/A	N/A	It is not considered that the policy would have a significant effect on achieving the SA Objective, however, the provision of publicly accessible green infrastructure may partially help to support the SA Objective if this would enable better access to education or training establishments.
CD1 To minimise potential	CS16: +	Short, Medium and Long term Indirect	Borough wide	The policy seeks to support proposals that create safe parks and open spaces and it also seeks to protect and enhance open spaces and sport and recreational facilities. The provision of safe open

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
opportunities for crime and anti-social activity		Reversible Low Certainty		spaces would make some contributions towards minimising potential opportunities for crime and anti-social behaviour.

Infrastructure

- Policy CS17: Delivering Infrastructure
- Policy CS18: Strategic Flood Defence
- Policy CS19: Provision of Health Services
- Policy CS20: Key Transport Proposals

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS17: +	Medium and Long-term Direct / Indirect Reversible Medium Certainty	Borough wide	<p>Whilst the primary focus of the infrastructure policies is not to address air quality issues, it is considered that adequate infrastructure would result in relief of congestion at key routes of the borough. In addition, the Community Infrastructure Levy (CIL) will help address road capacity and congestion issues off-site and thus result in improved air quality in the long term. The key transport proposals included in Policy CS20 aim to reduce vehicle movements through improved bus station provision, shuttle bus provision, new pedestrian links and high quality cycle routes. The Policy also seeks to support measures to facilitate cycling and walking in the borough as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (Policy SP15). Support for such measures could encourage more people to use sustainable travel modes and could make partial contributions towards achieving the SA Objective.</p> <p>In addition, Policy CS19 considers travel implications when allocating sites for health facilities. The SA Objective will be achieved through the allocation of new health facilities in or adjacent to the town centre or a district/local centre and the requirement for submission of a Travel Plan with the proposal for development at Heath Road.</p>
	CS18: 0			
	CS19: +			
	CS20: +			
ET2 To conserve soil resources and quality	CS17: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Within the town centre	<p>The development of the flood barrier would enable use of previously developed land within the town centre, therefore positive effects have been recorded against Policy CS18.</p>
	CS18: +			
	CS19: 0			
	CS20: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET3 To reduce waste	CS17: 0	N/A	N/A	Waste may be generated as a result of construction activities related to key infrastructure improvements; however it is considered unlikely to affect the SA Objective significantly. The policies would not contribute to reduction of waste per capita or the proportion of waste sent to landfill within the borough.
	CS18: 0			
	CS19: 0			
	CS20: 0			
ET4 To reduce the effects of traffic upon the environment	CS17: +	Medium and Long-term	Borough wide	Policies CS17, CS19, and CS20 would contribute to the achievement of the SA Objective through the provision of adequate infrastructure and subsequent relief of congestion at key routes of the borough. Highways infrastructure will be improved through the implementation of Policy CS20 to enable east-west movements and meet the need for high quality walking and cycling links around the Waterfront area. Policy CS20 would also encourage walking and cycling as it seeks to support measures to facilitate cycling and walking in the borough and would therefore make partial contributions in reducing traffic and its effects on the environment. New health facilities (Policy CS19) will promote the use of sustainable travel modes through the implementation of a travel plan and appropriate location.
	CS18: 0	Indirect		
	CS19: +	Reversible		
	CS20: ++	Medium certainty		
ET5 To improve access to key services for all sectors of the population	CS17: +	Medium and Long-term	Borough wide Island site Waterfront and town centre	Policies CS17 and CS20 will contribute to the achievement of the SA Objective through improved access between the Central Shopping area, Waterfront and railway station. Access to open space, school and health facilities and play areas will be ensured through specific site allocation and the provision of new social and green infrastructure, sports and leisure facilities to serve the whole borough. Policy CS20 seeks to provide a road bridge as well as pedestrian and cycle bridge across the Wet dock resulting in improved access to and from the Island site. The Policy also seeks to support further measures to facilitate walking and cycling within the borough.
	CS18: 0	Direct / Indirect		
	CS19: +	Reversible		
	CS20: ++	High certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET6 To limit and adapt to climate change	CS17: +	Medium and Long-term Direct / Indirect Reversible	Waterfront Island Site	<p>The Environment Agency has identified a risk of flooding on land adjacent to the River Orwell, the River Gipping, Belstead Brook and the small watercourse located within the northern part of the Northern Fringe. Flood defences are identified as key strategic infrastructure in CS17. Policy CS18 will contribute to the achievement of the SA Objective through delivery of strategic flood infrastructure including installing a tidal flood barrier as well as repairs to existing tidal and fluvial defences upstream.</p> <p>Policy CS20 aims to reduce dependency on private car by 15% through the Travel Ipswich Scheme which will contribute to the reduction of carbon emissions from transport. Similarly, Policy CS19 promotes the use of sustainable travel modes through the implementation of travel plans and appropriate location.</p>
	CS18: +			
	CS19: +			
	CS20: +			
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS17: +	Medium and Long-term Direct Reversible Medium certainty	Borough wide Waterfront Island Site	<p>Water management infrastructure is identified within Policy CS17 as strategic infrastructure. When delivering water management infrastructure <i>opportunities should be sought to consider sustainable solutions to drainage system and sewage collection as well as sustainable water supply network (this is provided in Policies CS1 and DM4)</i>. Flood risk will be reduced through the implementation of Policy CS17 and Policy CS18.</p>
	CS18: ++			
	CS19: 0			
	CS20: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on	CS17: +	Long-term Direct / Indirect Reversible Medium certainty	Borough wide	<p>Strategic green infrastructure along with town centre environmental enhancements will be financed through the implementation of Policy CS17. Positive effects would occur with the provision of a country park and open space. This will result in protection and enhancement of wildlife corridors which will be beneficial to any rare or endangered species. The policy will also provide opportunities for people to access wildlife and open green spaces therefore it is considered that the SA Objective will be achieved. The Policy also states that the Council will seek contributions to ensure that mitigation measures identified in the Habitats Regulations Assessment (HRA) can be addressed, including for any measures not classified as infrastructure, which will contribute further towards conserving and enhancing biodiversity particularly in respect of European protected sites.</p>
	CS18: 0			
	CS19: 0			
	CS20: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
SSSIs, SPAs and SACs				It is not anticipated that any of the proposed health facilities/key transport improvements will have any significant negative effects on designated sites of nature conservation importance due to the their location. It is anticipated that local issues should be able to be mitigated through appropriate design and management.
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS17: +	Medium and Long-term	Borough wide	<p>There are a great number of designated heritage assets (e.g. listed buildings) within the borough boundary and the majority of them are concentrated in the town centre. Policy CS17 may contribute to the achievement of the SA Objective through allocation of funds to enhance settings of heritage assets. Although no heritage or archaeology assets were specifically listed in the key strategic infrastructure requirements, the policy seeks to protect and conserve areas and sites of historical importance in a broader category of infrastructure to be secured or financed from new developments. There are no specific commitments as to which heritage assets (e.g. listed buildings, Historic Parks) will be restored or enhanced; <i>therefore it will beneficial to create a borough wide heritage assets register and identify the ones 'at risk' (as identified on Historic England's 'at risk' register) or with high priority.</i></p> <p>In addition it should be noted that the construction of a flood defence barrier may protect heritage assets from flood damage.</p>
	CS18: +	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS17: +	Short, Medium and Long-term	Borough wide	<p>Policy CS17 is likely to contribute to the achievement of the SA Objective through allocation of funds to investment into public realm improvements, green infrastructure, and town centre environmental enhancements. The provision of a Country Park or similar high quality provision to the north of Ipswich as part of mitigation derived from the HRA in order to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough would also contribute towards conserving and enhancing the quality and local distinctiveness of landscapes and townscapes.</p> <p>Transport proposals and new health facilities (CS20 and CS19) may have a negative impact on townscape; however high standards of design will be required through the implementation other policies in the Core Strategy.</p>
	CS18: 0	Direct		
	CS19: -	Reversible		
	CS20: -	Medium certainty		
HW1 To improve the health of those most in need	CS17: +	Medium and Long-term	Borough wide	<p>Policies CS17, CS19 and CS20 seek to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improved pedestrian and cycle routes, location of health facilities which has good transport links and the implementation of the Travel Ipswich Scheme. Policy CS17 seeks to create new areas of open space and a country park which may provide opportunities for recreation. Sport and leisure facilities will also be delivered through the implementation of policy CS17. In addition, policy CS19 has a specific focus on</p>
	CS18: +	Direct / Indirect		
	CS19: ++	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS20: +	Low certainty		<p>the adequate provision of health infrastructure at easily accessible locations. All of the above would seek to promote healthy lifestyles and may help to reduce overall high levels of health and disability deprivation. The promotion of sustainable transport may contribute to reducing vehicle emissions which can have positive health effects in the long term.</p> <p>The effects associated with the implementation of CS18 are also assessed as positive as reducing flood risk can benefit people's health and wellbeing.</p>
HW2 To improve the quality of life where people live and encourage community participation	CS17: +	Medium and Long-term	Borough wide	On the whole the quality of life will be improved though the provision of key infrastructure facilities e.g. schools, flood defences, key transport links etc. as listed in Policy CS17. Health benefits are identified with regard to reduced flood risk. Community participation will be encouraged with the provision of community facilities, sport and leisure facilities and the creation of a country park serving the whole borough. The policy also seeks to ensure that open space and children's play areas are provided. Access improvements included in policy CS20 will also contribute to the achievement of the SA Objective through the provision of high quality road and pedestrian/cycling network.
	CS18: +	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		
ER1 To reduce poverty and social exclusion	CS17: +	Medium and Long-term	Borough wide	Delivering infrastructure and Improved overall accessibility (CS17 and CS20) may contribute to improving social inclusion therefore it is considered that Policies CS17 and CS20 would have a positive effect and would contribute indirectly to the achievement of the SA Objective.
	CS18: 0	Indirect		
	CS19: 0	Reversible		
	CS20: +	Low certainty		
ER2 To offer everybody the	CS17: 0	N/A	N/A	The primary focus of this set of policies is not to address employment issues. Although some job opportunities will be created through local infrastructure projects and Policy CS18 may result in a greater availability of employment land it is anticipated that overall effect on employment figures will be negligible.
	CS18: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
opportunity for rewarding and satisfying employment	CS19: 0			
	CS20: 0			
ER3 To help meet the housing requirements for the whole community	CS17: 0	N/A	N/A	Housing provision is not a primary function of these policies. The policies would not contribute to the availability of housing to meet the identified needs.
	CS18: 0			
	CS19: 0			
	CS20: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS17: +	Medium and Long-term Indirect Reversible Medium certainty	Borough wide Waterfront	Policies CS17, CS18, and CS20 would encourage sustainable economic growth through their commitment to provide key infrastructure thus facilitating new business formation and meeting the needs of business through improved access. Big infrastructure projects such as the tidal flood barrier (CS18) may potentially help to diversify employment opportunities. In addition, town centre enhancements and enhanced pedestrian environment at the Waterfront may attract more visitors which will support the local economy. For these reasons effects have been assessed as positive.
	CS18: +			
	CS19: 0			
	CS20: +			
ER5 To support vital and viable	CS17: +	Medium and Long-term	Town and district centres	Delivering infrastructure and improved access to shops, services and facilities will be achieved through the implementation of Policies CS17 and CS20. There are clear commitments to provide better linkages between the
	CS18: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
town, district and local centres	CS19: 0	Reversible Medium certainty		Central Shopping area, the railway station and Waterfront and relieve congestion issues on key routes which will support the town economy and in particular the town centre.
	CS20: +			
ER6 To encourage efficient patterns of movement in support of economic growth	CS17: +	Medium and Long-term	Town and district centres	Policies CS18 and CS20 seek to ensure that better linkages between key areas in Ipswich are provided. The SA Objective will be achieved through the Ipswich Major Scheme 'Travel Ipswich' and accessibility improvements between the Central Shopping area, Waterfront, and railway station. Public transport services will be improved through bus station provision, passenger information, and shuttle bus provision. The proposed improvements to the pedestrian network would reduce the impact of traffic on the economy and promote the use of sustainable travel modes. For these reasons effects from the implementation of Policy CS17 and CS20 have been assessed as positive.
	CS18: 0	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		
ER7 To encourage and accommodate both indigenous and inward investment	CS17: +	Medium and Long-term	Borough wide	Policies CS17 and CS20 will contribute to the achievement of the SA Objective through the development of a high quality public realm and multi-functional green infrastructure in urban areas. The proposed environmental and accessibility improvements will enhance the reputation of town centre and suburb areas as places to work, live and visit. This may encourage inward investment therefore the effects are assessed as positive.
	CS18: 0	Direct / Indirect		
	CS19: 0	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS20: +			
CL1 To maintain and improve access to education and skills for both young people and adults	CS17: +	Medium and Long-term Direct / Indirect Reversible Low certainty	Borough wide	The implementation of Policy CS17 has the potential to improve educational attainment through the strategic provision of new schools, however, a low certainty has been recorded as it is uncertain whether the overall educational attainment would be improved significantly as other factors also influence the level of skills and qualifications.
	CS18: 0			
	CS19: 0			
	CS20: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	CS17: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	CS18: 0			
	CS19: 0			
	CS20: 0			

Appendix E

Sustainability Appraisal Matrices – Development Management Policies

Sustainable Development, Flooding and Sustainable Drainage

- Policy DM1: Sustainable Design and Construction
- Policy DM2: Decentralised Renewable or Low Carbon Energy
- Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments
- Policy DM4: Development and Flood Risk

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM1: +	Medium, Long-term Reversible Indirect Low certainty	Borough wide	The primary focus of Policy DM1 is not to reduce transport movements, however, within the BREEAM standard there is an accessibility index, which scores development on how accessible it is to various facilities via public transport. Therefore ensuring development is highly accessible by public transport over time may reduce vehicle movements and thus improve air quality – however, certainty is low.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ET2 To conserve soil resources and quality	DM1: +	Short, Medium, Long-term Reversible Direct / Indirect Medium / Low certainty	Borough wide	The primary focus of Policy DM1 is not to conserve soil quality and structure, however, the BREEAM standards score higher for development that includes conversions rather than new build. This would represent a sustainable use of land resources. However, certainty is very low. It is noted that the Code for Sustainable Homes has been withdrawn. Policy DM3's commitment to providing outdoor amenity space in new and existing developments would benefit this SA Objective through .protecting soil structure and quality from development.
	DM2: 0			
	DM3: +			
	DM4: 0			
ET3 To reduce waste	DM1: +	Short, Medium, Long-term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM1 states it will ensure new development meets various standards, including a BREEAM 'Very Good' new build non-residential development. Therefore new development would be required to demonstrate it promotes waste reduction, incorporates sustainable building principles and leads to a decreased amount of waste going to landfill. In addition, the policy would ensure new development makes adequate provisions for recycling.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ET4 To reduce the effects of traffic upon the environment	DM1: +	Medium, Long-term Reversible Indirect Low certainty	Borough wide	The primary focus of Policy DM1 is not to reduce transport movements, however, within the BREEAM standard there is an accessibility index, which scores development on how accessible it is to various facilities via public transport. Therefore ensuring development is highly accessible by public transport over time may reduce vehicle movements and thus reduce the effects of transport on the environment – however, certainty is low.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ET5 To improve access to key	DM1: +	Medium, Long-term Reversible	Borough wide	Policy DM3 would improve access to open space over the medium to long term through its commitment to ensuring new and existing developments provide adequate amenity space.
	DM2: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
services for all sectors of the population	DM3: 0	Direct Medium certainty		There is an accessibility index within the BREEAM standard, which scores development on how accessible it is to various facilities via public transport. Therefore ensuring development is highly accessible by public transport would benefit this SA objective.
	DM4: 0			
ET6 To limit and adapt to climate change	DM1: +++	Short, Medium, Long-term	Borough wide	Policies DM1, DM2 and DM4 would all contribute to the fulfilment of this SA Objective. Policy DM1 states that sustainable design and construction methods would be applied to new development in the borough through requiring new development to achieve reduction in CO2 emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L); requiring new development to meet water efficiency standards of 110 litres/person/day and requiring various BREEAM standards to be met. This would help to contribute to a reduction in greenhouse gas emissions, the demand for energy resources, increase energy efficiency and reduce CO2 emissions. With the introduction of the Home Quality Mark demonstrating factors including energy use and air quality, the council will seek to encourage applicants to achieve a high rating under the quality mark. Policy DM2 seeks to incorporate decentralised renewable and low carbon energy into new development which would reduce the demand for energy and increase energy efficiency along with increase the use of renewable energy. Policy DM4 would benefit the SA objective through ensuring new development does not exacerbate current flooding in the borough along with providing SuDs measures where appropriate. The Policy also ensures water efficiency measures are maximised in new development.
	DM2: +	Reversible		
	DM3: 0	Direct		
	DM4: +	High certainty		
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM1: +	Short, Medium, Long-term	Borough wide	Policy DM1 through its commitment to promoting sustainable design and construction (BREEAM, CO2 emissions reductions and water efficiency standards) would ensure surface water run-off from new developments is managed through SuDs along with guarding against water pollution. Policy DM4 would benefit the SA objective through ensuring new development does not exacerbate current flooding in the borough along with providing SuDs measures where appropriate. The Policy also ensures water efficiency measures are maximised in new development.
	DM2: 0	Reversible		
	DM3: 0	Direct		
	DM4: +++	Medium certainty		
ET8 To conserve and enhance biodiversity and geodiversity,	DM1: +	Short, Medium, Long-term	Borough wide	Although not the primary focus of the policies. DM1 and DM3 would benefit the SA Objective through the provision of amenity space along with gardens in new residential development. Both of which would provide greater opportunities for wildlife.
	DM2: ?	Reversible		
	DM3: +	Indirect		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
including favourable conditions on SSSIs, SPAs and SACs	DM4: 0	Medium / Low certainty		Decentralised renewable and low carbon energy schemes (Policy DM2) have the potential to impact on biodiversity. Particularly birds and bats with regards to wind turbines. As the location of such development is unknown, effects have been assessed as uncertain. It may even come from outside the borough. <i>It is recommended that the policy includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant effects.</i>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM1: 0 DM2: ? DM3: 0 DM4: 0	N/A	N/A	Some decentralised renewable and low carbon energy schemes (Policy DM2) have the potential to impact on the setting of heritage assets. As the location of such development is unknown, effects have been assessed as uncertain. It may even come from outside the borough. <i>It is recommended that the policy includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant effects.</i>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM1: 0 DM2: ? DM3: + DM4: 0	Short, Medium, Long-term Reversible Indirect Medium / Low certainty	Borough wide	Decentralised renewable and low carbon energy schemes (Policy DM2) have the potential to impact on the setting of landscape / townscape character and quality. Particularly wind turbines. As the location of such development is unknown, effects have been assessed as uncertain. It may even come from outside the borough. <i>It is recommended that the policy includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant effects.</i> Under DM3 the provision of amenity space as part of new development including gardens would provide positive effects on townscape character / quality through urban greening.
HW1 To improve the health of those most in need	DM1: + DM2: 0 DM3: + DM4: +	Short, Medium, Long-term Reversible Direct Medium certainty	Borough wide	Policy DM1 would ensure new development was highly accessible to existing facilities, including health facilities, through its commitment to ensuring BREEAM standards are met. The provision of amenity space within new and existing development that takes advantage of sunlight and daylight would benefit the health of occupants (Policy DM3). In addition, a positive score has been recorded against Policy DM4 as reducing flood risk can have a beneficial effect on health and well-being.
HW2 To improve the quality of life	DM1: 0 DM2: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
where people live and encourage community participation	DM3: 0			
	DM4: 0			
ER1 To reduce poverty and social exclusion	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER3 To help meet the housing requirements for the whole community	DM1: +	Short, Medium, Long-term Reversible Indirect Medium / Low certainty	Borough wide	Although the focus of Policy DM1 is not to provide new homes, its commitment to ensuring new build residential development achieves CO2 emissions reduction and water efficiency targets and conversions achieve a minimum BREEAM Domestic Refurbishment 'Very Good', may contribute to improving housing stock along with reducing high levels of living environment deprivation within the borough.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER5 To support vital and viable town, district and local centres	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER6 To encourage efficient patterns of movement in support of economic growth	DM1: 0 DM2: 0 DM3: 0 DM4: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER7 To encourage and accommodate both indigenous and inward investment	DM1: + DM2: 0 DM3: 0 DM4: +	Medium, Long-term Reversible Indirect Low certainty	Borough wide	Policy DM1 supports the preservation and development of a high quality built environment through its commitment for new residential development to meet CO2 emissions reduction and water efficiency targets and various BREEAM standards. Policy DM4 seeks to ensure new development is adequately protected from flooding in accordance with adopted standards. Both of the above may help to encourage and accommodate both indigenous and inward investment as it would also show the borough as a responsible place to invest. However certainty for this is very low.
CL1 To maintain and improve access to education and skills for both young people and adults	DM1: 0 DM2: 0 DM3: 0 DM4: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
CD1 To minimise potential opportunities for crime and anti-social activity	DM1: 0 DM2: 0 DM3: + DM4: 0	Short, Medium, Long-term Reversible Indirect Medium / Low certainty	Borough wide	Although the primary focus of Policy DM3 is to provide amenity space in new and existing development, its commitment to ensuring these areas are safe would benefit this SA Objective.

Urban Design Policies and Protecting Our Assets

- Policy DM5: Design and Character
- Policy DM6: Tall Buildings
- Policy DM8: Heritage Assets and Conservation
- Policy DM9: Buildings of Townscape Interest
- Policy DM10: Protection of Trees and Hedgerows

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	DM5: +	Short, Medium, Long term	Borough wide	<p>Policies DM5 and DM10 would contribute to the improvement of air quality in Ipswich.</p> <p>Incorporation of sustainable, greener transport methods such as cycling and public transport into designs will be driven by Policy DM5. DM5 also seeks to integrate land use and community cohesion, reducing the need to travel; reducing traffic and improving air quality. Finally criterion h in Policy DM5 would ensure new buildings in or around AQMAs are designed in such a way that they minimise, or at the very least do not increase localised retention of pollutants.</p> <p>Criterion e of Policy DM10 aims to encourage tree planting in Ipswich, to help achieve a target of 22% canopy cover by 2050. The policy also outlines that new development should integrate tree planting from the outset. Both of the above should increase tree cover in the area which in turn may help to improve air quality.</p>
	DM6: 0	Reversible		
	DM8: 0	Indirect		
	DM9: 0	Medium / Low certainty		
	DM10: +			
ET2 To conserve soil resources and quality	DM5: 0	Short, Medium and Long term	Borough wide	<p>Policy DM10 aims to increase and protect tree coverage in the area. A consequence of protecting wooded areas and trees with TPOs is that they would safeguard natural areas and ensure soil is not degraded.</p>
	DM6: 0	Reversible		
	DM8: 0	Indirect		
	DM9: 0	Low certainty		
	DM10: +			
ET3 To reduce waste	DM5: +	Short, Medium, Long	Borough wide	<p>Policy DM5 states it will assess the design quality for major residential development using the Building for Life 12 criteria (CABE at the Design Council / Design for Homes / HBF). Applicants would be expected to demonstrate that scheme designs can achieve a 'green' score in each category enabling schemes to be eligible for 'Building for Life Diamond' status. These building criteria promote waste reduction and sustainable building principles and should lead to decreased amounts of waste going to landfill. In addition, the</p>
	DM6: 0	Reversible		
	DM8: 0	Direct / Indirect		
	DM9: 0	Medium certainty		
	DM10: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				policy would ensure the layout of new development makes adequate provision for the recycling of waste materials.
ET4 To reduce the effects of traffic upon the environment	DM5: +	Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 states that in order to support Ipswich residents adopting sustainable lifestyles, the Council will make provisions for travel by cyclists and that layouts and designs provide a safe and useable public realm for all users – orientated towards sustainable transport modes. This over the medium to long term may help to reduce vehicle movements.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ET5 To improve access to key services for all sectors of the population	DM5: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ET6 To limit and adapt to climate change	DM5: +	Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 includes a number of different measures concerned with climate change limitation and adaption. It contains a variety of different aims to promote urban greening within the area, in forms such as green walls and roofs, increased canopy cover and soft landscaping. The council plans that these measures will combat the effects of climate change through, for example, increased tree cover 'contributing to urban cooling through evapotranspiration and providing micro-climatic effects that can reduce energy demands in buildings'. The policy also puts forward proposals to increase facilities and improve infrastructure for sustainable transport forms, such as cycling and walking. This should increase the usage of such transport forms and lead to a resultant decrease in less sustainable transport use – principally cars. Policy DM10 outlines proposals from the council to improve the tree coverage in the area. As stated above additional tree coverage has a number of benefits for mitigating the impacts of climate change.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: +			
ET7 To protect and enhance the	DM5: +	Medium and Long term Reversible	Borough wide	Policy DM5 contains proposals to increase urban greening in Ipswich. Part of the benefit of urban greening is that natural 'green' surfaces have
	DM6: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
quality of water features and resources and reduce the risk of flooding	DM8: 0 DM9: 0 DM10: 0	Indirect Low certainty		slower run-off times for water compared to hard urban surfaces.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM5: + DM6: 0 DM8: + DM9: 0 DM10: ++	Short, Medium and Long term Reversible Direct / Indirect Medium / Low certainty	Borough wide	<p>Policy DM5 states that provisions such as bat and bird boxes and swift bricks would be supplied to enhance biodiversity. In addition, the policy also contains plans to increase urban greening in the area. This would increase tree cover across Ipswich's built up areas and provide sites for increased flora and fauna to thrive.</p> <p>Policy DM8 is principally focussed on protecting sites for the conservation of heritage assets and important archaeological areas.</p> <p>Policy DM10 is directly concerned with the protection and enhancement of woodland and hedgerows. This would be implemented through a variety of measures, such as: designating TPOs, encouraging tree planting to help achieve a target of 22% canopy cover, enforcing assessments of trees/hedgerows and when removal does occur replanting to be undertaken. Each of these measures would in some way contribute to the protection and enhancement of biodiversity in Ipswich. <i>The policy may benefit further through including a reference to the Hedgerow Regulations 1997 which protect 'important hedgerows' from being removed (uprooted or destroyed).</i></p>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM5: + DM6: + DM8: ++ DM9: + DM10: 0	Short, Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	<p>The conservation and enhancement of heritage assets and sites of historical importance including Scheduled Monuments, scheduled parks and gardens and other remains of national importance and their settings is the chief concern of Policy DM8. It lays out measures to protect listed buildings from alterations deemed detrimental, protection of conservation areas and areas of archaeological importance. The Policy also states that the Council will resist the demolition or partial demolition of both designated and undesignated heritage assets</p> <p>Policy DM5 would benefit the SA Objective as it seeks to protect and enhance the distinctiveness of Ipswich including the setting of any nearby listed buildings.</p> <p>Policies DM6 and DM9 would also all benefit the SA Objective through their commitment to retaining buildings of townscape interest, ensuring tall buildings do not have adverse</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				effects on the setting of Conservation Areas and promoting high quality design, all of which would help to protect the historic character of the urban areas. Policy DM6 in particular also seeks to ensure that the design of proposed buildings addresses the potential effect of the building to listed buildings and other heritage assets.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM5: +	Short, Medium and Long term	Borough wide	<p>The special character and distinctiveness of Ipswich is recognised by Policy DM5. The policy also outlines that new large scale residential developments would be built to a high standard and to the Building for Life 12 criteria.</p> <p>Policy DM6 has the potential to safeguard local distinctiveness and character in Ipswich by refusing applications for tall buildings deemed inappropriate and insensitive to the local area.</p> <p>Policy DM9 is directly concerned with the protection, retention and repair of buildings judged to be of local townscape interest, particularly those with no other statutory protection. If these buildings must be modified or lost then the replacement standard must be at least equal if not higher and incorporate sustainable features. This would only benefit local townscape character.</p> <p>Policy DM8 would benefit townscape character in particular through the policy's commitment to protecting conservation areas.</p> <p>Policy DM10 would benefit the SA Objective through its commitment to protecting urban greening – this would only benefit local townscape.</p>
	DM6: +	Reversible		
	DM8: +	Direct / Indirect		
	DM9: ++	Medium certainty		
	DM10: +			
HW1 To improve the health of those most in need	DM5: +	Medium and Long term	Borough wide	<p>Promoting the integration of land uses into mixed developments and neighbourhoods is outlined within Policy DM5. This could lead to reduced need to travel and improved access to key local services such as GPs, dentists etc. The policy also outlines that new layouts and designs would be orientated towards accommodating cyclists and pedestrians.</p> <p>This could promote healthier and more sustainable forms of transport in Ipswich and help combat conditions such as obesity and its related health conditions. In addition, the introduction of new optional Building Standards for accessible and adaptable dwellings and wheelchair user dwellings would make contributions towards improving the health of those most in need.</p> <p>Although assessed as neutral, it is worth noting that the protection of trees and hedges along with promoting planting can have a small benefit to health and wellbeing.</p>
	DM6: 0	Reversible		
	DM8: 0	Indirect		
	DM9: 0	Medium certainty		
	DM10: 0			
HW2 To improve the quality of life	DM5: +	Medium and Long term	Borough wide	The policy reflects the introduction of new optional Building Regulations standards for accessible and adaptable dwellings and
	DM6: 0	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
where people live and encourage community participation	DM8: 0 DM9: 0 DM10: 0	Indirect Medium certainty		wheelchair user dwellings. The provision of these dwellings would contribute towards improving the quality of life where people live.
ER1 To reduce poverty and social exclusion	DM5: 0 DM6: 0 DM8: 0 DM9: 0 DM10: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM5: 0 DM6: 0 DM8: 0 DM9: 0 DM10: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER3 To help meet the housing requirements for the whole community	DM5: + DM6: 0 DM8: 0 DM9: 0 DM10: 0	Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 outlines that new residential development applications should meet the Building for Life 12 criteria. Moreover the policy sets out that applications for planning permission will be required to clearly demonstrate how submitted development proposals achieve urban design quality. The Policy requires new residential development of 10 or more dwellings to be built to standard M4(2) and new development where affordable housing is provided to build a proportion of the dwellings to Building Regulations standard M4(3) as part of the affordable housing provision which will help to meet housing requirement needs for the whole of the community. The new optional Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings will also help in complying with housing requirements which supports the SA Objective.
ER4	DM5: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM6: 0 DM8: 0 DM9: 0 DM10: 0			
ER5 To support vital and viable town, district and local centres	DM5: + DM6: 0 DM8: 0 DM9: 0 DM10: 0	Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 outlines requirements for new development in the area to, wherever possible, 'integrate residential, working and community environments'. In doing so local vitality should be increased and the need to travel reduced. In doing this, access to shops, facilities and services should be improved in Ipswich.
ER6 To encourage efficient patterns of movement in support of economic growth	DM5: + DM6: 0 DM8: 0 DM9: 0 DM10: 0	Short, Medium and Long Reversible Direct & Indirect Medium / Low certainty	Borough wide	Some provisions for improved facilities to accommodate sustainable transport are set out in Policy DM5. It outlines plans to increase the capacity to store bicycles and develop the network of sustainable transport infrastructure in the area. In turn, over the medium to long term this could reduce vehicle movements. In addition, the policy outlines plans to integrate land uses for new developments, such as has already been done on the Waterfront. This should result in a reduced need to travel and improve overall efficiency of the network.
ER7 To encourage and accommodate both indigenous and inward investment	DM5: + DM6: + DM8: 0 DM9: + DM10: +	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	Policies DM5, DM6 and DM9 all include measures to encourage a high quality built environment. Policy DM9 stipulates that if buildings deemed important to the local townscape need to be replaced then a quality of building equal to or higher must be implemented. Policy DM6 states that any new tall buildings built in the area must be of the highest architectural quality, design and construction as well as contributing to public space and facilities. Lastly Policy DM5 states that any new major residential developments will be expected to meet the Building for Life 12 criteria. All of these measures would contribute to an enhanced built environment that make improve the attractiveness of the area to invest. Additionally to this, Policies DM5 and DM10 encourage / protect urban greening in Ipswich and aim to improve urban areas with public art installations.
CL1	DM5: 0	N/A	N/A	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To maintain and improve access to education and skills for both young people and adults	DM6: 0			There is no clear relationship between the policies and the SA Objective.
	DM8: 0			
	DM9: 0			
	DM10: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM5: +	Short, Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 outlines plans to incorporate safety measures into design, through measures such as security lighting and CCTV. This should assist with the minimisation of crime and anti-social activity in the area. Over the long term this could help to reduce opportunities for crime in areas where crime deprivation is high.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			

Small Scale Residential Development, Small Scale Infill and Backland Residential Development, Subdivision of Family Dwellings, Affordable Housing and the Density of Residential Development

- Policy DM12: Extensions to Dwellinghouses and the Provision of Ancillary Buildings
- Policy DM13: Small Scale Infill and Backland Residential Developments
- Policy DM14: The Sub-division of Family Dwellings
- Policy DM24: Affordable Housing
- Policy DM30: The Density of Residential Development

Note: Principle and general location of new homes within the borough has been assessed within Policies CS2 and CS7. Therefore this assessment focusses on the details relating to the type and make up of new housing.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM12: 0	Medium and Long term	Ipswich town centre / very localised	<p>Policies DM12 and DM13 would result in very minor localised development, however, this is very unlikely to affect air quality to any significant degree.</p> <p>Policy DM30 promotes higher density housing within the town centre, which over time would increase the population living in the area. In turn this is likely to worsen traffic and air quality over the long-term and may affect the town centre AQMAs. Conversely promoting lower density housing elsewhere would not increase traffic movements to the same degree. It is worth noting, mitigation to increase sustainable travel is provided in Policy CS5.</p> <p>There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.</p>
	DM13: 0	Reversible		
	DM14: 0	Indirect		
	DM24: 0	Medium / Low certainty		
	DM30: +/-			
ET2 To conserve soil resources and quality	DM12: 0	Short, Medium and Long term	Borough wide	<p>It is unlikely that the Policies DM12 and DM24 would offer any significant effects to the SA Objective.</p> <p>Policy DM13 may result in the loss of gardens which would not represent a suitable use of soil resources – however, due to the amount of development this policy is likely to lead to effects are unlikely to be significant.</p> <p>Higher density development within the town centre means there would be a higher density on previously developed land which would be good for conserving soil resources. Conversely, lower density development outside the town centre and district centres would not represent the most sustainable use of soil resources.</p> <p>A positive score has been recorded for DM14 as the sub-division of family homes is better for land resources than building additional homes.</p>
	DM13: 0	Reversible		
	DM14: +	Direct		
	DM24: 0	Medium certainty		
	DM30: +/-			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET3 To reduce waste	DM12: 0	N/A	N/A	It is unlikely that the Policies would offer any significant effects to the SA Objective. However, it is worth noting that Policies DM13 and DM14 ensure that sufficient refuse, recycling and garden waste container storage would be provided for small scale infill residential development and family dwellings that are sub divided.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
ET4 To reduce the effects of traffic upon the environment	DM12: 0	Medium and Long term	Ipswich town centre / very localised	As per SA Objective ET1 'Air Quality' Policies DM12 and DM13 would result in very minor localised development, however, this is very unlikely to affect to affect traffic movements to any significant degree. Policy DM30 promotes higher density housing within the town centre, which over time would increase the population living in the area. In turn this is likely to worsen traffic over the long-term. Conversely promoting lower density housing elsewhere would not increase traffic movements to the same degree. It is worth noting, mitigation to increase sustainable travel is provided in Policy CS5. There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.
	DM13: 0	Reversible		
	DM14: 0	Indirect		
	DM24: 0	Medium / Low certainty		
	DM30: +/-			
ET5 To improve access to key services for all sectors of the population	DM12: 0	Medium and Long term	Borough wide	Effects have been recorded as positive and negative against Policy DM30 as higher density homes within the town centre would mean more homes are located within central areas which are close to amenities. However, this may not be true for lower density homes further away from the town centre.
	DM13: 0	Reversible		
	DM14: 0	Indirect		
	DM24: 0	Medium / Low certainty		
	DM30: +/-			
ET6 To limit and adapt to climate change	DM12: 0	Medium and Long term	Ipswich town centre / very localised	As per SA Objective ET1 'Air Quality' Policies DM12 and DM13 would result in very minor localised development, however, this is very unlikely to affect to affect traffic movements to any significant degree. Policy DM30 promotes higher density housing within the town centre, which over time would increase the population living in the area. In turn this is likely to worsen traffic (and associated carbon emissions) over the long-term. Conversely promoting lower density housing elsewhere would not increase traffic movements to the same degree. It is worth noting, mitigation to increase sustainable travel is provided in Policy CS5.
	DM13: -	Reversible		
	DM14: 0	Indirect		
	DM24: 0	Medium / Low certainty		
	DM30: +/-			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				<p>Infill development as per Policy DM13 may result in a loss of small permeable areas and contribute to urban flooding. Therefore there may be a requirement for SuDS. <i>However, this would be mitigated through Policy DM4.</i></p> <p>There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.</p>
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM12: 0	Short, Medium and Long term Reversible Indirect Medium / Low certainty	Ipswich town centre / very localised	<p>High density residential development within the town centre (Policy DM30), where there are large areas within Flood Zones 2 and 3 may exacerbate existing flooding issues and may reduce the scope to incorporate open space and SuDs measures.</p> <p>There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.</p> <p>Infill development as per Policy DM13 may result in a loss of small permeable areas and contribute to urban flooding. Therefore there may be a requirement for SuDS. <i>However, this would be mitigated through Policy DM4.</i></p> <p>Policy DM12 would result in very small scale development which is unlikely to affect the SA Objective at this strategic level.</p>
	DM13: -			
	DM14: 0			
	DM24: 0			
	DM30: -			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM12: 0	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	<p>Policy DM30 proposes high density development within the town centre which may affect the numerous county wildlife sites located there. However, it should be noted that there are more biodiverse areas outside the town centre where lower density development is proposed although the retention of gardens and space would be higher. Overall, effects are considered to be negative.</p> <p>Policy DM13 would result in a small-scale loss of urban greenspace which may affect biodiversity resources. <i>However, this would be mitigated through Policy CS4 and DM31.</i></p>
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: -			
ET9 To conserve and where appropriate enhance areas and sites of	DM12: 0	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	<p>Policies DM13 and DM14 seek to protect the setting of existing buildings and ensure listed buildings / conservation areas are protected against inappropriate infill residential development and the conversion of family homes. Both of which would benefit this SA Objective.</p>
	DM13: +			
	DM14: +			
	DM24: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
historical importance	DM30: ?			Higher density residential development within the town centre (Policy DM30) may lead to greater adverse effects on the setting of heritage assets as there would be less scope to provide soft landscaping that includes green infrastructure -both of which may offer benefits to the setting of heritage assets. However, it is understood this is not the focus of Policy DM30, the protection of heritage assets is covered within Policies CS4 and DM8. Due to the level of uncertainty, an uncertain score has been recorded against the policy.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM12: +	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	Policies DM12, DM13 and DM14 commit to ensuring associated residential development does not have an overbearing impact on neighbouring amenity, result in an adverse visual impact on the immediate street scene or affect the character of listed buildings and conservation areas. Therefore effects have been assessed as positive. Policy DM24 would benefit the SA Objective through ensuring that affordable homes are designed to the same standard as market homes along with appearing the same as market homes. In central areas, higher density is expected and is a characteristic of the existing townscape (Policy DM30). Although it is still important to ensure appropriate public open space it is also good that density is lower in the greener suburban areas as that is also more appropriate to the existing character.
	DM13: +			
	DM14: +			
	DM24: +			
	DM30: +			
HW1 To improve the health of those most in need	DM12: 0	Medium and Long term Reversible Indirect Low certainty	Borough wide	Policy DM24 relates to the design and integration of affordable homes which would offer health benefits.
	DM13: 0			
	DM14: 0			
	DM24: +			
	DM30: 0			
HW2 To improve the quality of life where people live and encourage community participation	DM12: +	Medium and Long term Reversible Indirect Medium certainty	Borough wide	Policies DM12, DM13 and DM14 all seek to ensure they do not lead to any adverse effects on neighbouring amenity therefore effects have been assessed as positive.
	DM13: +			
	DM14: +			
	DM24: 0			
	DM30: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER1 To reduce poverty and social exclusion	DM12: 0	N/A	N/A	The provision of affordable homes in Ipswich as outlined in Policy DM24 may contribute to reducing current high levels of living environment deprivation. Whilst sub-division is restricted in Policy DM14 unless appropriate, the creation of cheaper multiple occupancy dwellings is essential for some on low incomes.
	DM13: 0			
	DM14: +			
	DM24: +			
	DM30: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
ER3 To help meet the housing requirements for the whole community	DM12: ++	Short, Medium and Long term Reversible Direct Medium certainty	Borough wide	Ensuring there is a mix of affordable (Policy DM24), high density, medium density and low density new homes (DM30) across Ipswich would help to meet the housing requirements for the whole community, through the provision of flats to large family homes. Some of which would be affordable. Policies DM12, DM13 and DM14 are all related to meeting housing needs where appropriate, therefore effects have been recorded as positive.
	DM13: ++			
	DM14: ++			
	DM24: ++			
	DM30: ++			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
ER5 To support vital and viable town, district and local centres	DM12: 0	Medium and Long term Reversible Indirect Medium certainty	Town and district centres	Ensuring there is a mix of affordable (Policy DM24), high density, medium density and low density new homes (DM30) across Ipswich would help to support the viability of the town and district centres. It is very unlikely that Policies DM12, DM13 or DM14 would lead to any significant effects on the SA Objectives due to the highly localised nature of development they would lead to.
	DM13: 0			
	DM14: 0			
	DM24: +			
	DM30: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER6 To encourage efficient patterns of movement in support of economic growth	DM12: 0	Medium and Long term Reversible Indirect Medium certainty	Town centre	Higher density development within the town centre would ensure homes are close to amenities, jobs and transport hubs which would benefit this SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: +			
ER7 To encourage and accommodate both indigenous and inward investment	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
CL1 To maintain and improve access to education and skills for both young people and adults	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			

Transport and Access

- Policy DM17: Transport and Access in New Developments
- Policy DM18: Car and Cycle Parking

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM17: ++	Medium and Long-term	Borough wide	<p>Policy DM17 ensures that new development will not be permitted if it will lead to a significant adverse effect on air quality, in addition to ensuring sustainable transport access (walking, cycling, public transport and the Public Rights of Way (PRoW) network) is an integral part of new development, this would benefit local air quality and the associated AQMAs.</p> <p>Limiting parking within the town centre as per Policy DM18 may benefit the AQMAs over the long term. In addition, the provision of cycle parking may encourage people to use their bike rather than their car. Both of which would benefit air quality.</p>
	DM18: +	Direct / Indirect Reversible Medium Certainty		
ET2 To conserve soil resources and quality	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET3 To reduce waste	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET4 To reduce the effects of traffic upon the environment	DM17: ++	Medium and Long-term	Borough wide	<p>Policy DM17 ensures that new development will not be permitted if it will lead to a significant adverse effect on air quality (i.e. from transport), in addition ensuring sustainable transport access (walking, cycling, public transport and the PRoW network) is an integral part of new development would reduce the effects of traffic upon the environment.</p> <p>Limiting parking within the town centre as per Policy DM18 and providing cycle parking may encourage people to use their bike rather than their car over the long term. Both of which would benefit this SA Objective.</p>
	DM18: +	Direct / Indirect Reversible Medium Certainty		
ET5 To improve access to key services for all sectors of the population	DM17: +	Short, Medium and Long-term	Borough wide	The Policies commit to ensuring new development supports the use of sustainable modes of transport through a requirement to facilitate improved accessibility along with ensuring there is adequate cycle and parking provision across the borough. This would contribute to ensuring new development
	DM18: +	Direct Reversible Medium Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				maintains / improves access to essential services and facilities.
ET6 To limit and adapt to climate change	DM17: +	Medium and Long-term Direct / Indirect Reversible Medium Certainty	Borough wide	Policy DM17 ensures that new development will not be permitted if it will lead to a significant adverse effect on pollution (i.e. carbon emissions), in addition ensuring sustainable transport access (walking, cycling, public transport and the PRow network) is an integral part of new development would reduce carbon emissions from transport over the medium to long term. Limiting parking within the town centre as per Policy DM18 along with providing cycle parking may encourage people to use their bike rather than their car. Both of which would benefit this SA Objective.
	DM18: +			
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET10	DM17: 0		Borough wide	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM18: +	Short, Medium and Long-term Indirect Reversible Medium Certainty		Although protecting landscape / townscape is not the focus of the policy, DM18's commitment to ensuring car and cycle parking is fully integrated into the design of new schemes to create an attractive environment along with ensuring provisions do not dominate the local street scene would provide minor positive effects on the SA Objective.
HW1 To improve the health of those most in need	DM17: +	Medium and Long-term	Borough wide	Policy DM17 seeks to ensure the promotion of sustainable modes of transport (i.e. walking, cycling or using public transport) is integral to the design of new development. The promotion of sustainable transport may contribute to encouraging healthy lifestyles and reducing vehicle emissions – this can have positive health effects in the long term. In addition, the Public Rights of Way network provides opportunities for physical recreation and is a means of promoting mental and physical health. The provision of cycle parking as per Policy DM18 would also benefit this SA Objective through potentially encouraging people to cycle.
	DM18: +	Direct / Indirect Reversible Low certainty		
HW2 To improve the quality of life where people live and encourage community participation	DM17: +	Medium and Long-term	Borough wide	Walking and cycling as promoted and encouraged within the policies are good for quality of life.
	DM18: +	Direct / Indirect Reversible Low certainty		
ER1 To reduce poverty and social exclusion	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ER3	DM17: 0	N/A	N/A	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To help meet the housing requirements for the whole community	DM18: 0			There is no clear link between the policies and the SA Objective.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM17: 0 DM18: 0	N/A	N/A	Although effects have been assessed as neutral against the SA Objective, ensuring new development incorporates sustainable access into the design may contribute to ensuring transport infrastructure meets the needs of business. However, certainty for this is very low.
ER5 To support vital and viable town, district and local centres	DM17: + DM18: +	Short, Medium and Long-term Indirect Reversible Low Certainty	Local, district and the town centre	The Policies commit to ensuring new development supports the use of sustainable modes of transport through a requirement to facilitate improved accessibility along with ensuring there is adequate cycle and parking provision across the borough. This would contribute to ensuring new development maintains / improves access to essential services and facilities – most of which are located within the boroughs town centre, local and district centres, therefore this may have positive effects on the SA Objective.
ER6 To encourage efficient patterns of movement in support of economic growth	DM17: + DM18: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Policies DM17 and DM18 would benefit the SA Objective as they would contribute to ensuring new development meets people's transport infrastructure needs (including walking and cycling) along with ensuring new development is within 400m of public transport provision. This would promote the use of sustainable travel modes and may reduce dependence on the private car over the medium to long term. All of the above would encourage efficient patterns of movement to support economic growth.
ER7 To encourage and accommodate both indigenous and inward investment	DM17: + DM18: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Ensuring sites are accessible with sufficient car parking and cycle parking may make Ipswich a more attractive place people want to invest in.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
CL1 To maintain and improve access to education and skills for both young people and adults	DM17: 0	N/A	N/A	It is unlikely the policies would have any significant effects on the SA Objective.
	DM18: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM17: 0	Short, Medium and Long-term	Borough wide	Policy DM18 ensures that parking and cycling provision is secure and safe. This may reduce the risk of opportunistic crimes.
	DM18: +	Indirect Reversible Medium certainty		

Proposals in Retail Areas

- Policy DM20: The Central Shopping Area
- Policy DM21: District and Local Centres
- Policy DM22: Town Centre Uses Outside the Central Shopping Area
- Policy DM23: Retail Proposals Outside Defined Centres

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM20: 0	Medium and Long-term Indirect Reversible Medium / Low Certainty	Defined centres	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET2 To conserve soil resources and quality	DM20: 0	N/A	N/A	It is unlikely that Policies DM20, DM21, DM22 and DM23 would have any significant effects on the SA Objective as they simply state the type of use that will be permitted within defined boundaries and seek to restrict this type of development elsewhere.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET3 To reduce waste	DM20: 0	N/A	N/A	The proposed retail units would produce waste. However, this would also be true for other similar retail activity focussed in those areas. Therefore effects have been assessed as neutral.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET4 To reduce the effects of traffic upon the environment	DM20: 0	Medium and Long-term Indirect Reversible Medium Certainty	Outside defined centres	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of use elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET5 To improve access to key services for all sectors of the population	DM20: +	Short, Medium and Long-term Indirect Reversible Medium / Low Certainty	Borough wide	Policies DM20 and DM22 both seek to locate appropriate retail and community facilities within existing commercial areas that are highly accessible. Therefore effects have been assessed as positive. Policy DM21 would result in a new district centre and two new local centres along with town centre use development outside defined areas all of which may improve the accessibility to essential services for those that live away from existing commercial areas. In addition Policy DM23 seeks to restrict retail outside
	DM21: +			
	DM22: +			
	DM23: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				accessible centres where possible therefore would provide further beneficial effects.
ET6 To limit and adapt to climate change	DM20: 0	Medium and Long-term Indirect Reversible Medium Certainty	Outside defined centres	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET10 To conserve and enhance the quality and local	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail
	DM21: 0			
	DM22: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
distinctiveness of landscapes and townscapes	DM23: 0			areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
HW1 To improve the health of those most in need	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective. Policy DM22 may contribute to promoting healthy lifestyles though its support for leisure and recreation uses, which would be focused outside the central shopping area but within the town centre.
	DM21: 0			
	DM22: +			
	DM23: 0			
HW2 To improve the quality of life where people live and encourage community participation	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ER1 To reduce poverty and social exclusion	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM20: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Retail units within the accessible central shopping area (Policy DM20) along with the provision of local shops in accessible district and local centres (Policy DM21) may contribute over the medium to long term to reducing unemployment in areas most at need (there is currently high levels of employment and income deprivation within the town centre). The selection of appropriate retail types is an important component of this. Policy DM22s commitment to facilitating the development of leisure, recreation, culture and tourism use development within accessible the town centre again would benefit this SA Objective through providing job opportunities.
	DM21: +			
	DM22: +			
	DM23: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				Policy DM23 would also benefit the SA Objective through supporting existing centres, which may also support existing jobs in these centres.
ER3 To help meet the housing requirements for the whole community	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM20: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	The policies would encourage economic growth through their commitment to encouraging retail and community facilities. Specifically Policy DM22 may also help to diversify the job offer in Ipswich though promoting leisure, recreation, culture and tourism development within the town centre.
	DM21: +			
	DM22: +			
	DM23: +			
ER5 To support vital and viable town, district and local centres	DM20: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Town, district and local centres	Policies DM20, DM21, DM22 and DM23 all directly seek to support this SA Objective through focussing appropriate retail and commercial development within defined boundaries and deterring inappropriate use classes. This would not only support the viability of town, district and local centres but also improve the offer of retail and facilities within these areas.
	DM21: +			
	DM22: +			
	DM23: +			
ER6 To encourage efficient patterns of movement in support of economic growth	DM20: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	Focussing retail and commercial development within defined and accessible locations as per Policies DM20, DM21, DM22 and DM23 would benefit this SA Objective, through potentially creating 'one stop shop' areas. The selection of appropriate retail types is an important component of this.
	DM21: +			
	DM22: +			
	DM23: +			
ER7 To encourage and accommodate both indigenous and inward investment	DM20: +	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all directly seek to support this SA Objective through focussing appropriate retail and commercial development within defined boundaries and deterring inappropriate use classes. This should help to attract appropriate types of balanced investment. Development outside these areas would only be permitted where appropriate.
	DM21: +			
	DM22: +			
	DM23: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
CL1 To maintain and improve access to education and skills for both young people and adults	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			

Employment Land

- Policy DM25: Protection of Employment Land

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas within the borough which over the medium to long term may increase the number of job opportunities within those areas. In turn this may lead to an increase in vehicle movements related to people accessing employment and may negatively impact air quality and the AQMAs. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective. NB It is understood that promoting sustainable travel is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS5 and DM17.
ET2 To conserve soil resources and quality	DM25: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Employment areas	This policy would have positive effects by protecting existing land allocated for employment use and therefore potentially reduce demand for greenfield sites for employment use elsewhere in the borough. Conversely, employment areas within urban Ipswich located on previously developed land would protect soil resources and may result in remediation of contaminated sites if development is proposed. Effects have therefore been assessed as positive.
ET3 To reduce waste	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas which over the medium to long term may increase the number of people working in the borough. This could therefore increase the amount of waste produced per capita. However the Policy may also make partial positive contributions to achieving the SA Objective as the Policy, where compatible with adjacent land uses, seeks to provide waste facilities within employment land which could also contribute to increasing recycling. NB It is understood that reducing waste is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS4. It should also be noted that by retaining clusters of employment uses there may be benefits to be gained through facilitating recycling e.g. easier collections.
ET4 To reduce the effects of traffic upon the environment	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas within the borough which over the medium to long term may increase the number people working in the borough. In turn this may lead to an increase in vehicle movements related to people accessing employment. However, the clustering of employment areas within accessible locations may indirectly

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective. NB It is understood that promoting sustainable travel is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS5.
ET5 To improve access to key services for all sectors of the population	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
ET6 To limit and adapt to climate change	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas within the borough which over the medium to long term may increase the number of people working in the borough. In turn this may lead to an increase in vehicle movements (and carbon emissions) related to people accessing employment. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective. NB It is understood that promoting sustainable travel is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS5.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM25: -	Short, Medium and Long-term Direct Reversible Medium Certainty	IP One area	The focus of this policy is not to reduce and manage flooding and protect water quality, this is covered within Policy DM4. However, it should be noted there are employment areas within the IP One area located within Flood Zones 2 and 3. <i>In addition, any effects on water quality/pollution could be mitigated using standard, accepted mechanisms such as the Environment Agency's Pollution Prevention Guidelines.</i>
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM25: +	Short, Medium and Long-term Direct Reversible Low Certainty	Employment areas	The focus of this policy is not to conserve and enhance biodiversity and geodiversity, this is provided within Policies CS4 and DM31. However, it should be noted that protecting existing employment areas may reduce demand for future greenfield employment development.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM25: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	The focus of this policy is not to conserve and enhance heritage assets, this is provided in Policies CS4 and DM8. However, it should be noted that the policy may indirectly protect heritage assets elsewhere in the borough through potentially reducing future demand for employment development in more greenfield locations.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM25: +	Short, Medium and Long-term Direct Reversible Low Certainty	Borough wide	<p>The focus of this policy is not to conserve and enhance townscape / landscape character and quality, this is provided in Policy CS4 and a variety of DM policies. However, it should be noted that the policy may indirectly protect the landscape and townscape elsewhere in the borough through potentially reducing future demand for employment development in more greenfield locations.</p> <p>The HRA Appropriate Assessment identified that impacts from employment land could include increased risk of airborne emissions, water discharge and increased noise and light resulting in causing air pollution, water pollution and disturbance to birds respectively however the assessment concluded that employment sites generally have lower impact on European sites than housing and do not generate recreational impacts at distance as a result of increased human population therefore it concluded that the policy would not adversely affect the integrity of Stour and Orwell Estuaries SPA.</p>
HW1 To improve the health of those most in need	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
HW2 To improve the quality of life where people live and encourage community participation	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
ER1 To reduce poverty and social exclusion	DM25: +	Medium and Long-term Direct Reversible Medium / Low Certainty	Areas with high levels of employment and income deprivation	There are areas within the town centre which currently have high levels of employment deprivation and income deprivation. Therefore, the safeguarding of employment areas within the town centre may offer opportunities for new jobs over the medium to long term.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM25: ++	Short, Medium and Long-term Direct Reversible High Certainty	Borough wide	The policy directly supports the SA Objective as it seeks to safeguard employment areas within accessible locations across Ipswich. Over the long term development within the employment allocations may contribute to a reduction in unemployment in the areas most at need – employment and income deprivation is currently high within the IP One area.
ER3 To help meet the housing requirements for the whole community	DM25: +/-	N/A	N/A	The policy clarifies the way in which the Government's starter homes policy will be applied in relation to DM25 which could have both positive and negative effects upon meeting housing requirements as the focus of DM25 is upon protecting employment land.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM25: ++	Short, Medium and Long-term Direct Reversible High Certainty	Borough wide	The Policy safeguards land within Ipswich for employment development. This would help to encourage new business formation along with helping to increase and diversify employment opportunities. The location of employment areas within clusters and accessible locations along with providing a choice / variety of areas may prove attractive to new businesses and may support economic growth. The Policy also sets out criteria by which starter homes would be considered within Employment Areas in conjunction with the introduction of the Governments Starter Homes policy.
ER5 To support vital and viable town, district and local centres	DM25: +	Short, Medium and Long-term Direct Reversible High Certainty	Town centre and District and local centres	The Policy seeks to safeguard employment areas for businesses to locate within the town centre, district and local centres. This would help to support vital and viable town, district and local centres.
ER6 To encourage efficient patterns of movement in support of economic growth	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	The Policy safeguards allocated and existing employment land within Ipswich. This would help ensure there is sufficient land, buildings and premises available to accommodate business start-up and growth across Ipswich. Ultimately the policy may increase the number people working in the borough which may increase in vehicle movements, this may have an adverse effect on the current transport network. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER7 To encourage and accommodate both indigenous and inward investment	DM25: ++	Short, Medium and Long-term Indirect Reversible Low Certainty	Borough wide	The Policy safeguards employment areas across the borough largely within accessible locations. Choice and accessibility may prove attractive and could facilitate regeneration which could encourage both indigenous and inward investment.
CL1 To maintain and improve access to education and skills for both young people and adults	DM25: 0	N/A	N/A	Although effects have been assessed as neutral, the Policy would ultimately result in an increased employment offer in the borough. This may increase the number of apprenticeships available in the borough which would offer benefits to this SA Objective. However, this link could be considered tenuous.
CD1 To minimise potential opportunities for crime and anti-social activity	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.

Amenity, Open Space, Sport and Recreation and Community Facilities

- Policy DM26: Protection of Amenity
- Policy DM27: Non-residential Uses in Residential Areas
- Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities
- Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities
- Policy DM32: Protection and Provision of Community Facilities

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	DM26: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	It is unlikely the policies would significantly affect any of the SA Objectives. However, Policy DM26 states new development that could produce harmful effects e.g. air pollution will be directed to locations where they would minimise harm to the environment which may offer very minor benefits to the SA Objective.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ET2 To conserve soil resources and quality	DM26: 0	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Policies DM28 and DM29 seek to protect existing areas of open space within Ipswich together with providing new areas of open space as part of new development. This would help to maintain and enhance soil quality where possible, as such effects have been recorded as positive.
	DM27: 0			
	DM28: +			
	DM29: +			
	DM32: 0			
ET3 To reduce waste	DM26: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ET4 To reduce the effects of traffic upon the environment	DM26: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM27: 0			
	DM28: 0			
	DM29: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	DM32: 0			
ET5 To improve access to key services for all sectors of the population	DM26: 0	Short, Medium and Long-term	Borough wide	Policies DM28, DM29 and DM32 would benefit this SA Objective though their commitment to protecting existing areas of open space together with creating new areas within new development. This would therefore increase the offer within Ipswich. In addition, Policy DM32 specifically ensures a range of community facilities are available and meet local need within the borough.
	DM27: 0	Direct		
	DM28: +	Reversible		
	DM29: +	Medium Certainty		
	DM32: +			
ET6 To limit and adapt to climate change	DM26: 0	Short, Medium and Long-term	Borough wide	Green areas of open space can act as natural flood storage and attenuation. Therefore positive effects have been recorded against policies DM28 and DM29.
	DM27: 0	Indirect		
	DM28: +	Reversible		
	DM29: +	Medium Certainty		
	DM32: 0			
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM26: 0	Short, Medium and Long-term	Borough wide	As above.
	DM27: 0	Indirect		
	DM28: +	Reversible		
	DM29: +	Medium Certainty		
	DM32: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM26: 0	Short, Medium and Long-term	Borough wide	Ensuring areas of open space are safeguarded and new areas created within new development would offer opportunities for habitat creation and enhancement. It may also provide opportunities for people to access wildlife and open green spaces. Effects have therefore been assessed as positive against Policies DM28 and DM29.
	DM27: 0	Indirect		
	DM28: +	Reversible		
	DM29: +	Medium Certainty		
	DM32: 0			
ET9 To conserve and where	DM26: 0	Short, Medium and Long-term	Residential areas	Policy DM27 ensures that the scale and massing of non-residential use development in residential areas
	DM27: +	Indirect		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
appropriate enhance areas and sites of historical importance	DM28: 0 DM29: 0 DM32: 0	Reversible Low Certainty		is compatible with the surrounding area – this may indirectly benefit the historic landscape.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM26: 0 DM27: + DM28: + DM29: + DM32: 0	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Policy DM27 ensures that the scale and massing of non-residential use development in residential areas is compatible with the surrounding area – this may indirectly benefit the landscape / townscape character and quality. The protection of existing open space and the provision of new open space as part of new development would contribute to urban greening and benefit this SA Objective.
HW1 To improve the health of those most in need	DM26: 0 DM27: + DM28: + DM29: + DM32: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Ensuring noisy polluting activities as per Policy DM27 are not located by housing would benefit both mental physical health. Safeguarding the provision of community facilities and providing new facilities to meet local need (Policy DM32) would benefit this SA Objective through ensuring health and social care provision is adequate. In addition Policies DM28 and DM29 would benefit the SA Objective through safeguarding existing areas of open space and providing new opportunities for sport and recreation in new development. This would contribute to promoting healthy lifestyles across the borough.
HW2 To improve the quality of life where people live and encourage community participation	DM26: + DM27: + DM28: + DM29: + DM32: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	Policies DM26 and DM27 seek to guard against adverse effects on amenity resulting from new development. It seeks to do this by refusing development that would cause a material nuisance (i.e. through noise, light pollution etc.) and where it would be detrimental to human health. Therefore effects have been assessed as positive. The safeguarding of existing open space and provision of new open space may increase opportunities for community participation – albeit with a low certainty. However, effects have been assessed as positive against Policies DM28 and DM29. The protection and provision of community facilities would encourage community participation, therefore

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				effects have been assessed as positive against Policy DM32.
ER1 To reduce poverty and social exclusion	DM26: 0	Medium and Long-term Indirect Reversible Medium / Low Certainty	Borough wide	The protection and provision of community facilities as outlined in Policy DM32 may have indirect positive effects on reducing social exclusion.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: +			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree. However, the protection and provision of community facilities to meet local need (Policy DM32) may offer some new employment opportunities within the borough – albeit a small number.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER3 To help meet the housing requirements for the whole community	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER5 To support vital and viable	DM26: +	Short, Medium and Long-term Indirect	District and local centres	The protection and provision of community facilities to meet local need (Policy DM32) may offer some benefits to the SA Objective, through contributing to
	DM27: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
town, district and local centres	DM28: +	Reversible Medium / Low Certainty		ensuring district and local centres are viable. In addition, the protection and provision of open space and protection amenity would also all benefit this SA Objective.
	DM29: +			
	DM32: +			
ER6 To encourage efficient patterns of movement in support of economic growth	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER7 To encourage and accommodate both indigenous and inward investment	DM26: 0	Long-term Direct Reversible Low Certainty	Borough wide	Policies DM28 and DM29 would contribute to the achievement of this SA Objective through safeguarding and providing areas of open space in the borough. This could create multi-functional green infrastructure in urban areas which over the long term could make the borough a more visually attractive place to invest.
	DM27: 0			
	DM28: +			
	DM29: +			
	DM32: 0			
CL1 To maintain and improve access to education and skills for both young people and adults	DM26: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			

The Natural Environment

- Policy DM31: The Natural Environment
- Policy DM33: Green Corridors
- Policy DM34: Countryside

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM31: 0	N/A	N/A	Policies DM33 and DM31 seek to establish and enhance green corridors and ecological networks across the borough. Therefore the policy may make partial contributions to improving air quality - the provision of tree and vegetation planting would enable vegetation to improve air quality through the removal of carbon dioxide in the air. Policy DM34 states that development would only be permitted in the countryside where it contributes to strategic walking and cycling routes. Over the medium to long term this may offer some benefits to air quality though reducing vehicle movements. Overall however, effects on this SA Objective are likely to be negligible.
	DM33: 0			
	DM34: 0			
ET2 To conserve soil resources and quality	DM31: +	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Ipswich Green Corridors and ecological networks along with the countryside.	Policy DM31 and DM33 seek to establish and enhance green corridors and ecological networks within the borough which would protect soil resources. Policy DM34's commitment to guarding against inappropriate development within the countryside and retaining the best and most versatile agricultural land would contribute to the protection of the boroughs soil resource. In addition the Policy also seeks to permit countryside housing development that re-uses disused buildings which supports the conservation of soil resources.
	DM33: +			
	DM34: +			
ET3 To reduce waste	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ET4 To reduce the effects of traffic upon the environment	DM31: 0	N/A	N/A	Policy DM34 states that development would only be permitted in the countryside where it contributes to strategic walking and cycling routes. Over the medium to long term this may offer some benefits to reducing vehicle movements. However, this is not likely to be significant, therefore effects have been assessed as negligible.
	DM33: 0			
	DM34: 0			
ET5 To improve access to key services for all	DM31: 0	Short, Medium and Long-term Direct / Indirect Reversible	Ipswich Green Corridors and ecological networks along	The establishment and enhancement of green corridors and ecological networks as outlined within Policies DM31 and DM33 could increase connectivity and accessibility to key services within the borough. Policy DM33 in particular seeks to provide green
	DM33: +			
	DM34: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
sectors of the population		Medium Certainty	with the countryside.	corridors with recreational, amenity and transport functions. Policy DM34 promotes the recreational use of land that retains the open character of the countryside along with ensuring new development contributes to strategic walking and cycling routes which may improve access to areas of opens space for residents to enjoy.
ET6 To limit and adapt to climate change	DM31: 0	N/A	N/A	Policies DM33 and DM31 seek to establish and enhance green corridors and ecological networks across the borough. Therefore the policy may make partial contributions to reducing carbon emissions - the provision of tree and vegetation planting would also enable vegetation to help to minimise climate change through the removal of carbon dioxide in the air. All of which would benefit biodiversity. Policy DM34 states that development would only be permitted in the countryside where it contributes to strategic walking and cycling routes. Over the medium to long term this may offer some benefits to climate change though reducing vehicle movements. Overall however, effects on this SA Objective are likely to be negligible.
	DM33: +			
	DM34: 0			
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM31: +	Short, Medium and Long-term	Borough wide	Policy DM31 seeks to protect the Stour and Orwell Estuaries SSSI, SPA and Ramsar site which would contribute to this SA Objective. In addition, the creation of an ecological network and green corridors and protection of countryside across Ipswich would create areas that may benefit flood storage under all three policies.
	DM33: +	Direct		
	DM34: +	Reversible Medium Certainty		
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM31: ++	Short, Medium and Long-term	Borough wide	Policy DM31 commits to protecting and enhancing biodiversity across the borough including Europeans sites and SSSIs. The Policy in particular makes a requirement for development to conserve the nature conservation and geodiversity interest of County Wildlife Sites, RIGS and County Geological Sites. In addition, it also states that where possible enhancements for protected sites and protected and priority species will be expected. The Policy also makes specific provision for the protection of European sites that mirrors the Habitats Directive and states that in some instances developer contributions may be sought in relation to mitigation measures. In addition, the Policy seeks to establish an ecological network across the borough which would only benefit local wildlife along with help to facilitate movement throughout Ipswich. For these reasons effects have been assessed as major positive. <i>That said, the</i>
	DM33: ++	Direct		
	DM34: +	Reversible High Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				<p><i>policy could be strengthened through making reference to 'alone or in-combination with other proposals'.</i></p> <p>Policy DM33 supports the SA Objective as it seeks to establish and enhance green corridors within Ipswich which would provide vital connections between habitats for use by wildlife.</p> <p>Policy DM34 seeks to protect the countryside and retain its character. The countryside around Ipswich urban area provides an attractive setting for the town and links into its ecological and green networks. Under this Policy, the Suffolk Coast and Heaths AONB, would be protected – planning permission would only be granted in exceptional circumstances and in accordance with NPPF paragraph 116, for development that sought to conserve the landscape and scenic beauty of the AONB and contributed to the green rim / wildlife corridors across the borough.</p> <p>The HRA Appropriate Assessment identified that one green corridor is adjacent to The Stour and Orwell Estuaries SPA. However it concluded that Policy DM33 is unlikely to alter the public access, amenity, recreational and green transport functions of this area bearing in mind its current use and would not adversely affect the integrity of Stour and Orwell Estuaries SPA.</p>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM31: 0	N/A	N/A	<p>Policy DM34 would make positive contributions to the SA Objective as in the case of new housing, it seeks to permit development that is required to secure the future of a heritage asset.</p> <p>There is no clear link between Policy DM31 and Policy DM33 and the SA Objective.</p>
	DM33: 0			
	DM34: +			
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM31: +	Short, Medium and Long-term Direct / Indirect Reversible High Certainty	Borough wide	<p>Policy DM31 seeks to establish and enhance the borough's ecological network through encouraging development to provide net biodiversity gains commensurate with the scale of the proposal, through measures such as retaining existing habitat features, tree planting, habitat restoration or re-creation and comprehensive landscaping, which is appropriate to local wildlife. All of which would serve not only to enhance biodiversity but contribute to enhancing landscapes and townscapes within Ipswich.</p> <p>Policy DM33 seeks to establish attractive green corridors that contribute to improving the public realm and character of the borough. Within defined green corridors, only development that maintains / enhances the corridor's amenity and function would</p>
	DM33: +			
	DM34: ++			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				<p>be permitted. This would contribute to enhancing landscape and local distinctiveness within the borough.</p> <p>Policy DM34 seeks to retain the character of the countryside which would help to conserve the local distinctiveness of the local landscape and townscape. One of the principles of planning set out in the NPPF is that it should recognise the intrinsic character and beauty of the countryside – this is reflected within the Policy through discouraging development that does not respect the character of the countryside. DM34 also contains specific reference to conserving the landscape and scenic beauty of the AONB.</p> <p>In addition, in the case of new housing development, Policy DM34 seeks to permit countryside housing development that re-uses disused buildings and enhances the immediate setting or is of exceptional and innovative design which would contribute to conserving and enhancing quality and distinctiveness within the countryside.</p>
HW1 To improve the health of those most in need	DM31: +	Short, Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policies DM31, DM33 and DM34 may contribute towards the SA Objective. The establishment of attractive green corridors and ecological networks that connect the borough along with improving links to open spaces / the countryside may encourage people to walk / cycle which in turn may encourage healthy lifestyle choices along with benefitting mental wellbeing.
	DM33: ++			
	DM34: +			
HW2 To improve the quality of life where people live and encourage community participation	DM31: +	Short, Medium and Long-term Indirect Reversible Low Certainty	Borough wide	As above the establishment of attractive green corridors and ecological networks that connect the borough along with improving links to open spaces / the countryside may offer health benefits to those living in Ipswich – albeit a low certainty.
	DM33: +			
	DM34: +			
ER1 To reduce poverty and social exclusion	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER2 To offer everybody the	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
opportunity for rewarding and satisfying employment	DM34: 0			
ER3 To help meet the housing requirements for the whole community	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM31: 0	Short, Medium and Long-term Direct Reversible Low Certainty	Countryside	Policy DM34 may help to increase and diversify employment opportunities within the countryside as it states development would be permitted where it is necessary to support a sustainable rural business including tourism.
	DM33: 0			
	DM34: +			
ER5 To support vital and viable town, district and local centres	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER6 To encourage efficient patterns of movement in support of economic growth	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER7 To encourage and accommodate both indigenous and inward investment	DM31: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	Policies DM31 and DM33 both seek to promote the development of multi-functional green infrastructure in urban areas. This would offer benefits to this SA Objective through contributing to making urban Ipswich an attractive place people may want to invest in.
	DM33: +			
	DM34: 0			
CL1	DM31: 0	N/A	N/A	

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To maintain and improve access to education and skills for both young people and adults	DM33: 0			There is no clear link between the policies and the SA Objective.
	DM34: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM31: 0	Short, Medium and Long-term	Borough wide	Through Policies DM33 the Council would establish attractive green links which provide public access wherever safe and practicable which would contribute towards minimising opportunities for crime and anti-social behaviour.
	DM33: +	Indirect		
	DM34: 0	Reversible Medium Certainty		

Appendix F

2013 Focussed Review Alternative Assessment

Summary Appraisal of Policies and Alternatives – Table 3-1 from the 2013 Interim SA Report

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

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

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
business services; and public services.	<ul style="list-style-type: none"> life sciences, biotechnology and bloodstock; tourism; creative and cultural industries. 		<p>and CL1 (education) due to more opportunities for employment and training and more land allocated for employment use. Alternative 1 performs worse in the long term against the environmental SA objectives air quality, waste and climate change.</p> <p>Mitigation measures to reduce the negative effect would involve the use of sustainable modes of transport and reuse/recycling of materials.</p>
<p>CS14 Retail development</p> <p>Through the IP-One Area Action Plan, the Council will extend the Central Shopping Area to include the Westgate quarter and the land south of Crown Street and Old Foundry Road and allocate sites for retail development within it. This will enable the delivery of at least 35,000 sqm net of additional floorspace to diversify and improve the retail offer.</p>	<p>Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, the Council intends to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sqm net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD review following a review of the Retail capacity study to address provision after 2026.</p>	<p>The reduction of the retail floorspace figure is considered as a result of the DTZ Opportunity Sites Study 2013 and more recent monitoring data in order to reflect the current needs of the borough and to avoid over supply of land for retail use.</p> <p>The revised policy allows more flexibility for further reassessment depending on the retail needs of the borough after 2026.</p>	<p>Although the retail floorspace has been significantly reduced, the revised policy still performs well against the economic SA objectives ER1 (poverty), ER2 (employment), ER4 (sustainable growth), ER5 (vital and viable town centres), and ER7 (inward investment). In addition, some benefits are identified with regards to the allocation of retail floorspace in easily accessible areas encouraging the use of sustainable modes of transport with some positive indirect effect on climate change (SA objectives ET4, ET5 and ET6). Air quality effects are likely to be worse if alternative 1 (adopted policy 2011) is implemented due to more traffic generation to and from Ipswich town centre on weekends and public holidays.</p>
<p>CS17 Delivering Infrastructure</p> <p>Ipswich Borough Council adopted a standard charge approach to the delivery of infrastructure. Affordable housing and on-site open space provision was dealt with through planning obligations.</p>	<p>Developer will contribute to the delivery of infrastructure through Section 106 Agreements or CIL.</p>	<p>Section 106 Agreements will secure only affordable housing, on-site infrastructure and specifically identified off-site infrastructure items that will not require the pooling of more than five obligations.</p> <p>The developers' contributions under CIL regulations will allow infrastructure improvements throughout the whole area</p>	<p>The revised policy performs particularly well against SA objectives ET4 (traffic), ET5 (access), ET6 (climate change). It strongly supports objective ET7 (flood risk) through clear commitment to allocate contributions against flood defence works.</p> <p>In addition, it is considered that the revised policy provides more opportunities to contribute to the achievement ET8 objective due to increased potential</p>

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
		of Ipswich rather than just within the vicinity of new developments.	<p>to distribute contributions across the whole borough and cover a much wider area.</p> <p>Indirect positive effects are likely to occur with regards to economic objectives ER1 (poverty) and ER4 (sustainable growth) though the provision of key infrastructure where needs are identified.</p>

Appendix G (Available Upon Request)

Extract of Review of the Plans, Programmes and Environmental Protection Objectives and Baseline Data - Suffolk Coastal – Taken from the Suffolk Coastal District Council - Sustainability Appraisal Scoping Report Site Allocations and Area Specific Policies DPD and Felixstowe Peninsula AAP - November 2014

Appendix H (Available Upon Request)

Extract of the Review of Plans, Programmes and Environmental Protection Objectives and Baseline Data - Mid Suffolk and Babergh – Taken from Babergh District Council and Mid-Suffolk District Council Development Management Policies & Strategic Site Allocations Joint Sustainability Appraisal – Scoping Report – June 2014

Appendix I

Pre-submission Main Modifications for Public Consultation

Pre-submission Main Modifications for Public Consultation

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
CHAPTER 8				
CS1 Sustainable Development – Climate Change	Amend i a) Requiring building and infrastructure design to incorporate water conservation, capture, recycling and efficiency measures and sustainable drainage systems (SuDS); and	For consistency with new optional requirement for water use which has been introduced through the Building Regulations.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy which is still focussed on sustainable water use. Reference to water efficiency measures has been amended within the assessment of this Policy against SA Objectives ET3 and ET7.
CS2 The Location and Nature of Development	Add reference to community development support to clause a.: a) Focusing new residential ... of the town's district centres, <u>and supporting community development</u> ;	To ensure that major developments, whether high or lower density schemes, provide support for community development to promote wellbeing and social inclusion.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. The assessment of this Policy against SA Objectives ET5 and ER1 has been amended to include reference to how the focussed areas of new residential development can support community development and has been summarised within the Policy sustainability comments of the main SA Report. The assessment has not changed significantly.
CS2 The Location and Nature of Development	Remove 'prior' from sentence relating to the sustainable urban extension (below clause h.): ... is planned subject to the prior provision of ...	For consistency with CS10, Chapter 10 and the Ipswich Garden Suburb Supplementary Planning Document.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. The amendment brings Policy CS2 into line with the indicative trigger points identified in Table 8B. This modification has not resulted in any changes to the SA.
CS4 Protecting our Assets	Set out a strategic approach to the historic environment:	To fully reflect NPPF, and ensure that all aspects of the historic environment are addressed, as the draft policy only referred to conservation areas.	Historic England	The modification seeks to encompass all aspects of the historic environment which would need to be fully reflected within the SA. The

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>Amend sentence 1: replace historical with <u>heritage</u></p> <p>Amend sentence three to read: “The Council will also conserve and enhance heritage assets within the Borough through its development management policies, <u>the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance, and taking steps to reduce the number of heritage assets at risk</u>”.</p>			<p>policy is now more specific and stronger however the principle of the Policy remains unchanged.</p> <p>Reference to historical assets has been amended to heritage assets within the Policy sustainability comments of the main SA Report.</p> <p>The assessment of this Policy against SA Objective ET9 has been amended to include reference to the use of planning obligations as amended within the Policy text. The overall assessment score remains unchanged.</p>
CS4 Protecting our Assets	Amend clause (a) to read ‘... <u>sites, and protected and priority species;</u> ’	To ensure compliance with the Biodiversity Duty.	Suffolk County Council	<p>The modification ensures compliance with the Biodiversity duty and makes specific reference to provision within new development for protected and priority species strengthening the Policy.</p> <p>The assessment of this Policy against SA Objective ET8 has been amended to include protected and priority species. The overall assessment score remains unchanged.</p>
CS6 The Ipswich Policy Area	Amend final paragraph as follows: ‘The preparation of joint or aligned development plan documents is to be explored later in the plan period , to ensure ...	To clarify that joint work would begin sooner within the plan period.	Home Builders’ Federation	<p>The modification is of an editorial nature and does not change the principle of the Policy. If anything, it may bring forward more positive joint working sooner.</p> <p>This modification has not resulted in any changes to the SA of CS6, although this change has been</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
				<p>acknowledged in the assessment of CS6 against objective ER3 as contributing further towards meeting housing needs.</p> <p>Reference to 'later in the plan period' has been removed from the assessments of CS7 to reflect these changes to CS6.</p>
CS7 The Amount of Housing Required	<p>Amend the figures in the policy and accompanying tables to reflect the updating of the baseline to 1st April 2015:</p> <p>'... The Council will allocate land to provide for at least an additional 5,434<u>5,429</u> dwellings net in the Borough, with a lower amount of 4,734<u>4,629</u> expected by 2031 to ...'</p> <p>'... To meet the remaining requirement of 5,851<u>5,578</u> dwellings to 2031, the Council ...'</p> <p>Revised Tables 2, 3 and 4 are attached at the end of this schedule.</p> <p>Make consequent amendments to explanatory text:</p> <p>8.80 Table 2 shows that, as a result of housing completions between 2011 and 2014<u>2015</u>, 13,004<u>12,473</u> dwellings remain to be delivered between 2014<u>2015</u> and 2031 in order to meet the requirement.</p>	To ensure that the plan submitted is up to date.	Editorial	<p>The SA assessment has been amended to reflect the changes to the figures. These relatively minor amendments reflect the housing that has been built and permitted to 1st April 2015 so do not change the SA scoring. A slight change in the proportions of development to increase the number of dwellings in the IP-One area and decrease in the number at the Garden Suburb to be completed by 2031 does not change the SA effects given the small scale of change compared to the overall number of units proposed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	8.81 ... are capable of delivering the housing requirement in the ten years to 2024 2025. The ...			
CS10 Ipswich Garden Suburb	<p>Amendments to reflect the current position:</p> <p>'The site, identified on the policies map, consists of 195ha of land which will be developed <u>comprehensively</u> as a garden suburb ...'</p> <p>'A prerequisite for any development being granted planning permission in the garden Suburb will be the preparation by the Council of a supplementary planning document providing a development brief to:</p> <p><u>A supplementary planning document has been prepared to:</u></p> <ul style="list-style-type: none"> a. guide ... b. amplify ... c. etc. <p><u>Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD.'</u></p>	To align closely with the Ipswich Garden Suburb SPD and ensure that development follows the guidance set out within it.	Editorial update. Also Crest Strategic, Ipswich Society, Ben Gummer MP	<p>The policy is strengthened to ensure the SPD is adhered to.</p> <p>The sustainability comments of the main SA Report for this Policy have been amended to include the additional text within the Policy although the overall assessment score remains unchanged.</p>
CS10 Ipswich Garden Suburb/paragraph 8.108	<p>Insert new text to paragraph 8.108:</p> <p>'The infrastructure requirements at the Garden Suburb will be significant and include new roads ecological networks</p>	To clarify the Council's options in relation to ensuring the Garden Suburb is delivered.	Editorial update	The assessment of this Policy against SA Objectives HW2, ER3, ER4, ET4 and ET5 has been amended to note that the potential use of compulsory purchase powers

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>and green corridors, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities. This infrastructure can also deliver benefits to the existing communities in the area and help to sustain them. <u>A comprehensive and coordinated approach to the development of the Garden Suburb is required to ensure the proper planning and delivery of this infrastructure. The Council will consider using its compulsory purchase powers, where necessary, to enable comprehensive development and infrastructure delivery to take place.</u> The detailed infrastructure requirements of the development of approximately 3,500 dwellings at the Garden Suburb and trigger points for the delivery of the items of infrastructure are identified in Table 8B in Chapter 10 of the Core Strategy. Prior to development on the Ipswich School Playing Fields site, replacement sports facilities will be required to be first provided in accordance with policy DM28. The site for replacement playing fields is allocated to the west of Tuddenham Road and north of the railway line.'</p>			<p>to enable development and infrastructure delivery could support the SA Objectives. The extra wording reduces the uncertainty regarding whether or not essential infrastructure and amenities will be provided in a timely manner in the development of the Garden Suburb. The policy is strengthened to ensure a comprehensive approach is taken to infrastructure delivery.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
CS11 Gypsy and Traveller Accommodation	<p>Amend clause (a) to 'where possible preferably, within 1km of basic services including the public transport network.'</p> <p>Add in clauses a) to c) of Site Allocations Policy SP4:</p> <p>'Provision will be found within the Ipswich Policy Area for additional permanent pitches to meet the need as identified through the Gypsy and Travellers Accommodation Assessment.</p> <p><u>Applications for the provision of permanent pitches will be considered against the following criteria:</u></p> <ul style="list-style-type: none"> a) <u>The existing level of local provision and need for sites;</u> b) <u>The availability (or lack) of alternative accommodation for the applicants; and</u> c) <u>Other personal circumstances of the applicant, including the proposed occupants, must meet the definition of Gypsy or Traveller.</u> <p>Site for additional ...'</p>	<p>To address concern that if this were not possible a site could still be acceptable.</p> <p>To avoid confusion from having two policies in two plans.</p>	<p>National Federation of Gypsy Liaison Groups</p> <p>Editorial update</p>	<p>The modification addresses the provision of permanent pitches and does not change the principle of the Policy.</p>
CS13 Planning for jobs growth	<p>Amend to clarify that the job figure relates to the Borough:</p> <p>'It will encourage the provision of in the region of <u>approximately 12,500 jobs in the Borough</u> between 2011 and 2031...'</p>	<p>For clarity and to respond to comments which suggested it is not clear which geographic area the jobs figure relates to.</p>	<p>Editorial update and Northern Fringe Protection Group and others</p>	<p>The modification is of an editorial nature and does not change the principle of the Policy as this was already assumed in the original assessment.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
CS17 Infrastructure	<p>Amend policy to clarify that the direct provision of infrastructure by developers is allowed as mitigation for impacts (as an alternative to a commuted sum or CIL payment only). Add the following to the end of paragraph 2: <u>'...CIL charge, or other mechanism as agreed with the Council.'</u></p> <p>Add to end of policy <u>'The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment can be addressed, including for any measures not classified as infrastructure.'</u></p>	<p>For clarity and to ensure infrastructure is provided.</p> <p>To ensure that CS17 would enable contributions for HRA mitigation measures, including those that might not be classed as infrastructure, to be secured.</p>	<p>NHS England</p> <p>Editorial Update</p>	<p>The modification of the Policy broadens the form by which developers can mitigate against impacts.</p> <p>The assessment of this Policy against SA Objective ET8 has been amended to include benefits of the additional text on seeking contributions to ensure mitigation measures addressed within the HRA towards achieving the SA Objective.</p>
CS17 / new 8.183	<p>Insert new paragraph 8.183 relating to the above: <u>'The Habitats Regulations Assessment identifies a range of measures to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough are mitigated. This relates to mitigating the cumulative effect of housing growth across Ipswich Borough, in combination with housing growth in Suffolk Coastal district. The measures include the provision of the Country Park or similar high quality provision to the north of Ipswich, delivering parts b, d, e, g and h of policy CS16, production and implementation of visitor management plans at key sites and a monitoring programme to assess visitor impact over time. The Council is considering the production of a mitigation strategy which would specify</u></p>	<p>To explain the reason for specific reference to HRA mitigation in the policy.</p>	<p>Editorial update</p>	<p>The new text provides an explanation to the addition of HRA mitigation measures to the Policy.</p> <p>This additional explanatory text has been considered within the assessment of the Policy against SA Objective ET10. The SA score has not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<u>the measures required and how these should be delivered and funded.'</u>			
CS20 Key Transport Proposals	<p>Amend policy to add reference to proposals in policy SP15 of Site Allocations DPD: <u>'The Council will support further measures to facilitate cycling and walking in the Borough, as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.'</u></p> <p>Add explanatory text to paragraph 8.208</p> <p><u>'Detailed proposals, including those for the Star Lane gyratory and additional infrastructure for pedestrians and cyclists, are included in ...'</u></p>	For clarity and completeness.	Ipswich Society	<p>The Policy is amended to include specific reference to supporting measures to facilitate cycling and walking in the Borough.</p> <p>The assessments of the Policy against SA Objectives ET1, ET4 and ET5 have been amended to reflect the Policy modification. The SA scores have not changed.</p>
CHAPTER 9				
DM1 Sustainable Design and Construction	<p>Amend to reflect Government's position on Code for Sustainable Homes, zero carbon dwellings and allowable solutions as follows:</p> <p>New development shall be required to achieve a high standard of environmental sustainability. This will be achieved by the following standards:</p> <p>a. — New build residential development should achieve a minimum of Level 4 of the Code for Sustainable Homes standard or equivalent;</p>	<p>To reflect withdrawal of Code for Sustainable Homes, introduction of optional water standards and powers for requiring energy efficiency standards (see Ministerial Statement March 2015).</p> <p>To also reflect the Government's statement contained within the Fixing the Foundations paper (HM Treasury, July 2015) which states that: 'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing</p>	Editorial update (also CBRE)	<p>The Policy now requires new development to achieve a high standard of environmental sustainability by replacing the minimum level 4 Code for Sustainable Homes requirement with achieving 19% reductions of CO2 emissions below the 2013 Building Regulations Target Emission Rate.</p> <p>A new standard has also been introduced requiring development to meet water efficiency standards of 110 litres/person/day. These amendments will be reflected within the assessment in particular as reference to the Code for Sustainable Homes will need to be replaced.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>a. New build residential development should achieve reductions in CO₂ emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L):</u></p> <p><u>b. New build residential development should meet water efficiency standards of 110 litres/person/day:</u></p> <p><u>bc.</u> Conversions and changes of use of existing buildings providing new residential dwellings should achieve a minimum of BREEAM Domestic Refurbishment Very Good standard or equivalent;</p> <p><u>ed.</u> New build non-residential development of 500m² and above for the whole development should achieve a minimum of BREEAM Very Good standard or equivalent;</p> <p><u>de.</u> Conversions and changes of use to non-residential uses with an internal floor area of 500m² and above should achieve a minimum of BREEAM Very Good standard or equivalent.</p> <p>9.5 The National Planning Policy Framework sets out how local planning can best support the achievement of sustainable development. Specifically it requires that local planning authorities plan with a presumption in favour of sustainable development. The aim of</p>	<p>measures to increase energy efficiency of new buildings should be allowed time to become established.'</p> <p>Note: The Planning and Energy Act 2008 allows planning authorities to require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations (Section 1(c)). Regulation 43 of the Deregulation Act 2015 sets out a provision for this to not apply to residential development, however this requires commencement via secondary legislation which has so far not been put in place.</p>		<p>Notably, the emissions reductions targets will support SA Objective ET1 To improve air quality. It is noted however that whilst the Code for Sustainable Homes has been replaced, the new standards and BREEAM requirements maintain the principle of the Policy.</p> <p>The additional text in relation to the zero carbon Allowable Solutions scheme clarifies the Government's intention not to proceed with the scheme though energy efficiency standards will be kept under review in order that existing energy efficiency measures can become established.</p> <p>The SA assessment and main report have been amended to reflect the withdrawal of the Code for Sustainable Homes and the inclusion of new standards for water efficiency and CO₂ emissions. The SA scores have not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>local planning authorities should be to adopt proactive strategies to mitigate and adapt to climate change and a move towards a low carbon future. <u>The National Planning Policy Framework states that w</u>When setting local requirements for a building's sustainability, local authorities should do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards. The Government has further reiterated its commitment to reducing carbon emissions from new development, and that all new homes will be required to be zero carbon from 2016 through its current Housing Standards Review²³ and also proposes requiring non-residential developments to be zero carbon from 2019.</p> <p><u>Under the 2008 Planning and Energy Act local planning authorities may require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In accordance with the provisions of the March 2015 Ministerial Statement¹, the Council will expect new build residential development</u></p>			

	Reason	Objector(s)	Significance to the SA
<p>improvement in energy 2013 Target Emission lent to meeting the s of level 4 of the Sustainable Homes.</p> <p>home, as currently the zero carbon umme, is one where arbon emissions ne regulated energy the home (i.e. , hot water and fixed not plug-in s proposed that this d through fabric y measures, on-site vable or low carbon on or through utions to carbon sures established as vable solutions' s intended that as part ew homes must meet y standards</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Regulations²⁴. These proposed amendments to the Building Regulations equate to reductions in carbon emissions of around 20% above current (2013) requirements. The Government had until recently been proposing to introduce zero carbon homes which would have been achieved through a requirement to meet level 4 of the Code for Sustainable Homes along with 'allowable solutions' (a range of measures including further fabric energy efficiency measures, on or off-site renewable/low carbon energy generation and/or financial contributions to carbon abatement measures). However, the Government has recently announced that it does not intend to proceed with the allowable solutions scheme or with the proposed increased energy efficiency requirement, but state that energy efficiency measures will be kept under review. ²</u></p> <p>9.7 The Code for Sustainable Homes (CfSH) sets out nine categories against which a home can be rated. Energy efficiency and water efficiency categories have their own minimum standards that must be achieved at every level of the CfSH, recognising their importance</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>to the sustainability of any home. Other categories include better management of surface water run-off, waste management (including construction waste and encouraging household recycling), pollution and management of the home, all of which contribute to the sustainable performance of homes.</p> <p>9.8 The Council considers the CfSH to be a particularly appropriate tool to assess sustainability of new residential developments in that it is a nationally accredited system that considers a wide range of sustainability criteria in addition to energy and CO2 emissions, and in particular water use. Similar benefits apply to the use of the BREEAM system of assessment for multi-residential uses (e.g. care homes, sheltered housing, student accommodation) and for non-residential uses.</p> <p>9.9 Through the Housing Standards Review, referred to above, in addition to securing delivery of the zero carbon homes programme, the Government also intends to replace all elements of the Code for Sustainable Homes with updated Building Regulations and powers for</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>planning authorities to require more stringent 'optional' requirements through planning policies where these can be justified on the basis of need. The optional requirements are proposed to cover the accessibility (for example for the elderly and disabled) and water efficiency. The Government is also proposing a nationally described space standard through the Housing Standards Review (as referred to alongside policy DM30).</p> <p>9.10 Whilst it is clear that much of the drive for carbon reduction in new homes and non-domestic buildings will be handled under the Building Regulations, the Council nevertheless considers it appropriate to have a planning policy requiring new development to achieve sustainability improvements beyond the requirements of Building Regulations both to support the carbon reduction agenda and to ensure the achievement of a more holistic approach to sustainable development through the achievement of the much wider range of environmental and social benefits that these schemes provide for.</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>9.11 The policy provides for some flexibility in exceptional circumstances where it can be clearly demonstrated that achieving the required rating<u>standard</u> for the type and scale of development in question would either be not feasible or not viable in the light of such considerations as site constraints, other planning requirements, other development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower CfSH<u>or BREEAM rating or lower energy efficiency standards</u> being achieved having regard to other merits of the scheme in terms of sustainability and urban design. Development will still need to meet the requirements of the Building Regulations in force at the time.</p> <p>9.13 <u>In relation to BREEAM requirements,</u> tThe policy will be implemented through a requirement for the submission of Design Stage Assessments and Post Construction Reviews, carried out by a qualified CfSH<u>or BREEAM</u> assessor (as appropriate), for all planning applications for qualifying development. It will be expected that planning applications also be accompanied by a sustainability statement that explains and illustrates how sustainability considerations have influenced scheme design.</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Through the Housing Standards Review the Government has introduced powers for planning authorities to require 'optional' standards for water efficiency. The East Anglian area is identified as an area of 'severe water stress' and lowering water demand is identified as one of a range of measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. The optional requirement, which requires development to meet water efficiency standards of 110 litres/person/day (compared to Building Regulations requirements of 125 litres/person/day) is set out in Part G of the Building Regulations³.</u></p> <p>9.14 Where appropriate, mitigation measures shall be secured by condition to ensure that any pollution through air, noise, dust or vibration during the construction phase of development will not be detrimental to the amenity of neighbouring uses. Relevant policy guidance in respect of neighbouring amenity can be found in DM26.</p> <p>¹ <u>Planning Update March 2015 (Ministerial Statement)</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>² <u>Fixing the Foundations – Creating a More Prosperous Nation (HM Treasury, July 2015)</u></p> <p>³ <u>2010 Building Regulations: Sanitation, Hot Water Safety and Water Efficiency – Approved Document (2015 Edition)</u></p> <p>⁴ <u>Housing Standards Review – Technical Consultation (Department for Communities and Local Government, 2014)</u></p> <p><u>Next steps to zero carbon homes – Allowable Solutions (Department for Communities and Local Government, 2014)</u></p>			
DM5 Design and Character	<p>Amend Part e. of DM5 as follows:</p> <p>‘Protecting and enhancing the special character and distinctiveness of Ipswich, including significant views that are recognised as being important and worth protecting , <u>the setting of any nearby listed buildings</u>, and helping to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene’</p>	For completeness.	Suffolk Preservation Society	<p>The modification is of an editorial nature for completeness in relation to the protection of the character and distinctiveness of Ipswich to include the setting of any nearby listed buildings, it does not change the principle of the Policy.</p> <p>The SA assessment has been amended to reflect the protection of the setting of listed buildings although the SA scores have not changed.</p>
DM5 Design and Character	<p>Add to end of policy DM5: <u>In new residential development of 10 or more dwellings, 35% of new dwellings will be required to be built to Building Regulations standard M4(2). Where affordable housing is provided a proportion of dwellings are required to</u></p>	To reflect the introduction of new optional standards for accessible and adaptable dwellings and wheelchair user dwellings.	Editorial update, CBRE	The new text within the Policy reflects the introduction of new optional standards for accessible and adaptable dwellings and wheelchair user dwellings. This addition does not change the principle of the Policy.

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>be built to Building Regulations standard M4(3) as part of the affordable housing provision. The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.</u></p> <p>The following text to be amended accordingly in 9.43: In an era of rapid social, economic, environmental and technological change, buildings need to be designed to be adaptable to respond in a sustainable manner to the changing needs of occupiers. This is the 'long-life, loose- fit' principle. It could be achieved using the lifetime homes principle to ensure that homes can meet families' changing needs over time. For commercial buildings, it could mean ensuring that a building designed as an office for one organisation is physically capable of being subdivided, should future patterns of demand change.</p> <p>Insert new paragraphs after 9.43: <u>In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings. These optional standards can only be required through a planning policy requirement. The national Planning</u></p>			<p>The main SA report and the assessment of the Policy against HW1, HW2 and ER3 have been appropriately amended to reflect the housing requirements and new optional Building Regulations standard relating to accessible and adaptable dwellings. A positive score has been added against the quality of life SA Objective HW2.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Practice Guidance states that 'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.'</u></p> <p><u>The 2014 Suffolk Housing Survey indicates that 10% of Ipswich residents live in a home which has been adapted in some way for accessibility purposes. The results indicate that a further 3% of Ipswich residents currently require adaptations to their dwellings. Since 2007 almost 1,600 adaptations have been carried out on the Council's housing stock. The number and proportion of elderly residents in the Borough is predicted to increase over future years, potentially further increasing the need for dwellings to be accessible and adaptable.</u></p> <p>Delete: 9.51 ... The Council also encourages new housing to be built to the Lifetime Homes standard, which makes it easier for people to remain in their own homes as their mobility needs change, through encouraging homes to be built in a way in which rooms can be used flexibly over time.</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
DM6 Tall Buildings	Amend clause j. to read: 'the effect of the building in terms of its silhouette and impact on strategic views, with particular reference to conservation areas, <u>listed buildings and other heritage assets</u> , and the wooded skyline visible from and towards central Ipswich.'	For clarity.	Historic England	<p>The modification is of an editorial nature providing clarity of the text and does not change the principle of the Policy .</p> <p>The main SA report and the assessment of the Policy have been appropriately amended to reflect the addition of listed buildings and other heritage assets. This is not sufficient to further improve the positive SA scores against the heritage and townscape SA Objectives.</p>
DM8 Heritage Assets and Conservation	<p>Amend the policy as follows:</p> <p>Part a. Listed Buildings Re-label as <u>Designated and Undesignated Assets</u></p> <p>Amend the first paragraph of Part a. to remove the word historical ('... adversely affect its historical significance.')</p> <p>Add a third paragraph to Part a. as follows:</p> <p><u>The Council will resist the demolition or partial demolition of both designated and undesignated heritage assets as outlined in paragraph 133 of the National Planning Policy Framework.</u></p> <p>Add a fourth paragraph to Part a. as follows:</p> <p><u>The Council will seek to preserve Scheduled Monuments, scheduled</u></p>	To ensure the policy is effective and consistent with national policy.	Historic England Suffolk County Council	<p>The re-labelling and addition of new text provides consistency with national policy. The principle of the Policy remains unchanged and the additions serve to strengthen the Policy.</p> <p>The assessment of the Policy has been appropriately amended to reflect the additional Policy text in relation to SA objective ET9 although the SA scores have not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>parks and gardens and other remains of national importance and their settings, in a manner appropriate to their significance.</u></p> <p>Part b Conservation Areas</p> <p>Amend point (i) of Part b. to read:</p> <p>the building/structure does not <u>make a positive contribution to the significance</u> of the conservation area.</p> <p>Part c. Archaeology</p> <p>Within the Area of Archaeological Importance defined on the policies map, Development will not be permitted which may disturb remains below ground, unless the proposal is supported by an appropriate archaeological assessment of the archaeological significance of the site and, if necessary, a programme of archaeological work—investigation in accordance with that assessment.</p> <p>Planning permission will not be granted if the remains identified are of sufficient importance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>In all other circumstances where planning permission is to be granted, the Council may impose a condition allowing an appropriate contractor to monitor the works under archaeological supervision and control during the necessary stages of construction.</p> <p>In locations outside of the Area of Archaeological Importance, where it becomes apparent through a planning application that there is an overriding case for archaeological remains found to be preserved in situ, then the requirements for the above sites within the Area of Archaeological Importance will apply. Where <u>archaeological potential is identified but</u> there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to an appropriate programme of archaeological investigation, and recording being undertaken prior to the commencement of development, <u>reporting and archiving.</u></p> <p>Add a heading of <u>Climate Change</u> above the final policy paragraph.</p> <p><i>(See also minor changes to the explanatory text to DM8 in the additional modifications table.)</i></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
DM10 Protection of Trees and Hedgerows	Clarify that clause (b) relates to applications for works to trees through adding the following text: <u>'In relation to applications for works to trees, only granting...'</u>	For clarity	CBRE	The modification is of an editorial nature providing clarity of the text and does not change the principle of the Policy.
DM12 Extensions to Dwellinghouses and the Provision of Ancillary Buildings	Amend annex policy to be more explicit in relation to extensions: ... development that would provide for a residential annex will only be permitted where this: e. <u>is an extension that</u> would be subordinate in scale to the main residence and capable of being integrated into the main dwellinghouse once the dependency need has ceased;	To clarify the policy.	Editorial update.	The modification is of an editorial nature providing clarity of the text and does not change the principle of the Policy. This modification has not resulted in any changes to the SA.
DM18 Car and Cycle Parking	Amend car parking policy to refer to adopted standards: The Council will require minimum <u>adopted</u> standards of	To reflect the Council's adoption on 10 th February 2015 of the Suffolk Parking Standards.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. This modification has not resulted in any changes to the SA.
DM20 The Central Shopping Area and DM21 District and Local Centres	Include reference to betting shops and payday loan shops alongside references to A2-A5: <u>'... A2-A5 uses, betting shops and payday loan shops will be ...'</u>	Betting shops and payday loans shops were previously A2 and would have been included in calculations of A2-A5 frontage. They are now Sui Generis uses and need particular reference within the policy. This does not change the meaning of the policy at the time it was consulted upon.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. This modification has not resulted in any changes to the SA.
DM24 Affordable Housing	Amend clause a. as follows: a. Is designed and built to at least the same standard as the market housing, including the appropriate level of the Code	To align with changes to the Code and Policy DM1.	Crest Strategic, CBRE	The deletion reflects the withdrawal of the Code for Sustainable Homes and does not change the principle of the Policy. The requirements of DM1 are still relevant and the lack of a

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	for Sustainable Homes at the time;			cross-reference does not affect the overall outcome. Reference to the Code for Sustainable Homes has been removed throughout the SA.
DM25 / 9.149	<p>Add additional criteria to DM25 relating specifically to starter homes: <u>In the case of Starter Homes, these would only be permitted where:</u></p> <ul style="list-style-type: none"> a) <u>there is no demand for continued use of the site for employment or commercial purposes as demonstrated by a marketing programme;</u> b) <u>where the site is allocated for employment or commercial uses it is demonstrated that there is no reasonable prospect of the site being used for the allocated use, or other uses as detailed under the terms of criteria a-e above, during plan period; and</u> c) <u>housing would be compatible with existing and planned surrounding uses.</u> <p>New paragraph for supporting text: <u>On 2nd March 2015 the Government introduced its Starter Homes policy¹. Under this policy opportunities should be sought for provision of starter homes on 'commercial and industrial land that is either underused or unviable in its current or former use, and which has not currently been identified for housing.'</u> Updates to the Planning</p>	<p>Whilst the Government has provided policy in the form of the Ministerial Statement dated 2nd March 2015 and within the updated Planning Practice Guidance, it is considered important to include criteria within the Local Plan to ensure the policy does not undermine other policies within the Plan, particularly in relation to delivery of employment and commercial development. In particular, due to the constrained nature of the Borough boundary, the loss of employment land which has a prospect of being used for such purposes during the plan period would undermine the Council's efforts to meet the requirements of paragraph 20 of the NPPF which states 'To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.' The proposed policy wording ensures the Council's approach to Starter Homes is in accordance with the economic policies of the NPPF as well as the Starter Homes policy.</p>	<p>Editorial update.</p>	<p>The additional criteria added to the Policy specifically relates to starter homes which previously have not been mentioned within the Policy.</p> <p>The additional starter homes criteria have been referenced within the assessment against SA Objectives ER3 and ER4. The overall result against ER3 is recorded as positive and negative and against ER4 has not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Practice Guidance identify the circumstances in which starter homes should be supported. However, for clarity of how this policy should operate alongside DM25, and to ensure consistency with the approach in both the National Planning Policy Framework and other policies of the Local Plan in relation to economic growth, it is considered appropriate to establish a clear set of criteria on how such applications will be considered.</u></p> <p>¹ <u>Written statement to Parliament – Starter Homes (Department of Communities and Local Government, March 2015)</u></p>			
DM25 / 9.152	<p>Add to the end of 9.152: <u>'Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.'</u></p>	To ensure compliance with the Suffolk Minerals and Waste Plans.	Suffolk County Council.	<p>The addition would allow for the provision of waste facilities where compatible within employment areas.</p> <p>The assessment of the Policy against SA Objective ET3 'To reduce waste' has been reassessed to score both positive and negative as the provision of waste facilities on employment land where compatible would make contributions towards achieving the SA Objective. Note: waste facilities themselves would be considered under the policies of the Suffolk Waste Core Strategy.</p>
DM29 Provision of New Open Spaces, Sport and Recreation Facilities	<p>Re-write policy DM29 as follows:</p> <p><u>The Council will ensure that public open spaces and sport and recreation facilities are provided through new developments to meet the needs of their occupiers and, where appropriate,</u></p>	<p>To ensure compliance with CIL Regulations 122-124, which came into force in April 2015.</p> <p>Also need to reflect possibility of securing developer funding for strategic accessible natural greenspace provision</p>	Editorial update.	The rewrite of the Policy ultimately ensures compliance with CIL Regulations 122-124 and reflects the possibility of securing developer funding for strategic accessible natural greenspace provision / green

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>contributions are provided to strategic accessible natural greenspace.</u></p> <p><u>In all new residential developments of 15 dwellings or more (or on sites of 0.5ha or more), at least 10% of the site area, or 15% in high density residential developments, should consist of on-site green space that is usable by the public, which will contribute to meeting the overall requirement. Where possible, public green spaces should be well overlooked, and the provision within large-scale developments should be distributed throughout the site.</u></p> <p><u>These developments would also be expected to mitigate their own impact through the provision of the various open space and facility typologies identified in Appendix 6. Where applying the quantity standards based on a population forecast of the development would exceed the Council's minimum size threshold for the typology, there will be a presumption in favour of on-site provision. Where this is not practicable or the Council prefers enhancement opportunities at existing facilities, then an in lieu contribution to new or existing off-site provision should be secured through a planning obligation.</u></p> <p><u>Where the quantity standard for a typology would not meet the minimum size threshold, a qualitative assessment of existing provision within the Appendix 6 accessibility standard distance from</u></p>	<p>/ green rim, including possibly outside Borough.</p>		<p>rim. The principle of the Policy and its assessment remain unchanged.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>the site (480m or 720m) should be made to determine whether an enhancement opportunity exists. Where a reasonable improvement can be identified, a contribution should be secured where this would be necessary to make the development acceptable.</u></p> <p><u>The effect of on-site provision or off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.</u></p> <p><u>One-for-one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on the overall requirement. In addition, standards for children's and young people's facilities will be not be applied to elderly persons' accommodation and nursing homes.</u></p> <p><u>For non-residential developments of 1,000 sq. m floor space or more, the provision of or a contribution to public open spaces and outdoor sports facilities will be negotiated on a case-by-case basis.</u></p> <p>Re-write the reasoned justification as follows:</p> <p><u>9.172 The policy outlines that at least 10% of the site area of all qualifying developments must consist of public</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>green space, which shall include soft landscaping and tree planting to facilitate sustainable urban drainage and enhance the climate change resilience, appearance and biodiversity value of the development. In high density residential developments (defined in Policy DM30), the green space requirement will be a minimum of 15% of the site area, to compensate for the more limited amenity space in these developments and to provide an attractive setting for the buildings. The 10%/15% requirement will also contribute to the amenity green space and/or natural and semi natural green space standards as outlined in Appendix 6. It is expected that amenity green spaces in particular would be located on generally flat land in order to maximise their use. Where provision is distributed throughout large-scale developments, it is important that it adequately meets the intended use.</u></p> <p><u>9.173 Where possible, green spaces should provide for wildlife habitats designed and located so as to create a link with existing ecological networks and/or green corridors, which may include the proposed green rim around Ipswich for sites on the edge of the Borough. All planting proposals should be accompanied by an appropriate management plan. Within IP-One, the provision of a public civic space may be considered in lieu of green space where</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>this makes a positive contribution to the townscape.</u></p> <p><u>9.174 The policy makes provision for instances where it is not practicable to include a type of open space or facility on-site. This will include factors where its provision would compromise other standards in this Plan, such as meeting the density requirements of Policy DM30 or the minimum garden sizes of Policy DM3.</u></p> <p><u>New para: Accessible natural greenspace is defined by Natural England as places where human control and activities are not intensive so that a feeling of naturalness is allowed to predominate. There is no local standard for the provision of strategic accessible natural green space ('ANG') per person or dwelling. However, the mapping of existing provision against the 'Nature Nearby' standards has identified areas of deficit, particularly across north west Ipswich. The Council will aim to address these deficits where it can be achieved through also meeting the local standards for natural and semi-natural greenspace.</u></p> <p><u>9.175 The Council's Public Open Space Supplementary Planning Document (SPD) will provide guidance on population forecasts from new developments and outline the minimum size standard for each Appendix 6 typology. The document will also indicate per square metre capital and</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>maintenance costs for each typology where these are to be provided and/or maintained by the Council, and to guide in lieu contributions for new off-site provision. Where a contribution is secured to enhance an existing area of open space or facility, this sum will be based on the works required and in proportion to the scale of the development.</u></p> <p><u>9.176 The quality standards for the various typologies are identified by the Ipswich Open Space, Sport and Recreation Study, Play Strategy, Allotment Strategy and Open Space and Biodiversity Policy/Strategy, and any subsequent updates to these. Furthermore, the need for formal sports provision is currently being updated by the production of the Indoor Sports Facility Strategy and the Playing Pitch Strategy.</u></p> <p><u>9.177 New commercial development may create a demand for amenity green space and/or sports facilities. Therefore, specific needs will be considered in the context of each application with the quantity standards in Appendix 6 applied on the basis of the total number of full-time equivalent employees.</u></p>			
9.181 / 9.182 (DM30)	<p>Amend to include new nationally described space standards:</p> <p>9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space</p>	Nationally described space standards were introduced in March 2015 and the recent update to the Planning Practice Guidance states that planning authorities should only refer to these.	Editorial update, CBRE	The Policy update reflects current housing space standards. The principle of the Policy remains unchanged.

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to exceed minimum floorspace areas used by the former English Partnerships in its own developments (Quality Standards 2007) (gross internal floor area).</p> <p>9.182 These are as follows;</p> <ul style="list-style-type: none"> • at least 51 sq m for a 1 bed/2 person dwelling • at least 66 sq m for a 2 bed/3 person dwelling • at least 77 sq m for a 2 bed/4 person dwelling • at least 93 sq m for a 3 bed/5 person dwelling and • at least 106 sq m for a 4 bed/6 person dwelling. <p>9.183 The Government, through the Housing Standards Review, is currently proposing a set of national space standards. In relation to the standards set out above these would generally require larger floor areas where two storey 1 or 2 bed dwellings are proposed and where three storey 3 or 4 bed dwellings are proposed and could become a requirement through the</p>			This modification has not resulted in any changes to the SA.

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>adoption of planning policy to that effect.</p> <p><u>9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to meet the Nationally Described Space Standards as set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015).</u></p>			
DM31 / 9.187	<p><u>9.187....'Assessments under the Habitats Directive have been undertaken in relation to the production of the Core Strategy and Policies DPD Review and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD. Mitigation measures have been identified and in some instances developer contributions may be sought in relation to these and/or additional mitigation measures identified through assessments at planning application stage.'</u></p>	For clarification that, whilst not specified under CS17 other than in relation to the country park and strategic green infrastructure, developer funding may be sought to mitigate impact(s) upon European protected site(s).	Editorial update	<p>The additional text provides clarification within the Policy that developer contributions may be sought to mitigate against impacts to European protected sites.</p> <p>The assessment of the Policy against SA Objectives ET8 has been amended to reflect the additional Policy text although the SA score against the Biodiversity SA objective is already major positive so has not been amended further.</p>
DM31 / 9.188 / 9.189	Amend paragraph 4 of the policy:	To comply with the Biodiversity Duty and for clarity.	Suffolk County Council	<p>The modification amends the Policy making nature conservation a requirement for development.</p> <p>The additional text added to comply with the Biodiversity Duty and for</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>'The Council will seek to <u>Development</u> will be required to conserve and enhance the nature conservation...'</p> <p>'...and County Geodiversity Sites identified on the policies map, and Suffolk Biodiversity Action Plan <u>protected and priority</u> species and habitats, by ...,'</p> <p>Add new sentence to the end '<u>Enhancements for protected sites and protected and priority species will be expected where possible.</u>'</p> <p>Add to 9.188 '<u>Many species are protected through specific legislation including the Wildlife and Countryside Act 1981 (as amended). England's priority species and habitats are those which are included on the list produced under Section 41 of the Natural Environment and Rural Communities Act 2006. Suffolk's priority species and habitats are identified in the Suffolk Biodiversity Action Plan.</u>'</p> <p>Add to 9.189: <u>The British Standard Guidance 'Biodiversity: Code of Practice for</u></p>			<p>clarity serves to strengthen the Policy and will not change the SA.</p> <p>The assessment of the Policy against SA Objective ET8 has been amended to reflect the additional Policy text. The SA score has not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<u>Planning and Development (BS42020)' provides an approach to dealing with biodiversity issues in development.</u>			
DM32	Remove 'to non-community uses' from paragraph 2.	Loss of one community use for another may still result in the loss of a valued facility.	Theatres Trust	<p>This removal clarifies that redevelopment or change of use of a community facility is not solely to non-community uses.</p> <p>This modification has not resulted in any changes to the SA.</p>
DM33	<p>Amend 1st sentence of paragraph 4 as follows: 'Within the defined green corridors, development will only be permitted where it would maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions.' <u>'Development within the green corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions.'</u></p>	To clarify that the policy does not imply that development within the corridors would not be supported.	CBRE	<p>The modification provides clarification in that it no longer implies that development within green corridors would not be supported.</p> <p>This modification has not resulted in any changes to the SA.</p>
DM34 Countryside	<p>Amend reference to the AONB:</p> <p>In the case of the AONB, major development will only be permitted in exceptional circumstances in accordance with NPPF paragraph 116. <u>The landscape and scenic beauty of the AONB should be conserved.</u></p>	To ensure that development outside the AONB would not impact upon it.	Suffolk County Council.	<p>The modification simply places an emphasis on the importance of the landscape and scenic beauty of the AONB in the consideration of major development but maintains the essence of the Policy.</p> <p>The assessment of the Policy against SA Objectives ET8 has been amended to reflect the additional Policy text. The SA score has not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>Proposals for development in the countryside should:</p> <p>a. Maintain ...;</p> <p>b. Conserve the landscape and scenic beauty of the AONB;</p>			
DM34 Countryside	<p>Amend clause f.</p> <p>'f. In the case of new housing, be a dwelling: i) required for the efficient operation of an existing rural enterprise which cannot be met nearby; ii) <u>required to secure the future of a heritage asset;</u> iii) <u>which re-uses a disused building and enhances the immediate setting;</u> or iv) <u>of exceptional and innovative design.</u>'</p> <p>Add additional sentence: '<u>Proposals for residential development of more than one dwelling would be considered in the context of criteria a to e above.</u>'</p>	To fully reflect NPPF paragraph 55.	Gladman Developments	<p>The additional amendment to the clause and additional text added to the Policy do not alter the principle of the Policy.</p> <p>The assessment of the Policy against SA Objectives ET2 and ET10 has been amended to reflect the additional Policy text. The SA score has not changed.</p>

Pre-Submission Additional Modifications Table

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
Throughout	Change references to English Heritage to Historic England.	To reflect change in title.	Editorial update	Reference to English Heritage has been changed to Historic England throughout the SA.
Throughout	Change references to the Highways Agency to Highways England.	To reflect change in title.	Editorial update	The SA has been reviewed and does not contain reference to the Highways Agency therefore no further action is required.
CHAPTER 1				
Diagram 1 Context for the Ipswich Local Plan	Add reference to Ipswich Central's 'Ipswich Vision'.	For completeness – the Council signed up to the vision in July 2015.	Editorial update	This modification has not resulted in any changes to the SA.
CHAPTER 2				
2.1	Amend second sentence as follows: 'The national approach to planning policy matters is set out <u>principally</u> in the National Planning Policy Framework (NPPF), <u>but also within documents covering specific topics such as the Marine Policy Statement and Planning Policy for Travellers Sites.</u> '	To clarify that there are other national planning policy documents.	Marine Management Organisation	The modification clarifies that the national approach to planning policy matters is set out within the NPPF as well as other national planning policy documents. This modification has not resulted in any changes to the SA.
CHAPTER 5				
5.7	Amend the sentence to read: ' Ipswich <u>Partners have agreed a Greater Ipswich City Deal</u> with the'	For accuracy.	Ben Gummer MP	The modification is intended to provide accuracy to state that partners have agreed a Greater Ipswich City Deal. This modification has not resulted in any changes to the SA.
CHAPTER 6				
6.17	Amend final sentence to read ' <u>Alongside the focus on the central area, the Ddelivery of a significant number of homes through a sustainable urban extension on greenfield land at the Ipswich Garden Suburb will also occur during the plan period.</u> '	To clarify that the Ipswich Garden Suburb development represents a significant part of the housing growth set out in the Plan.	CBRE	The additional text ensures this paragraph is consistent with policies in the plan and therefore does not lead to changes in the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
New paragraph to be inserted between existing paragraphs 6.18 and 6.19	<u>'In July 2015 a non-statutory document entitled 'The Vision for Ipswich: East Anglia's Waterfront Town' was published by partners – University Campus Suffolk, New Anglia Local Enterprise Partnership, Suffolk County Council, Ipswich Central, Ipswich Borough Council, Ben Gummer MP and the Ipswich Chamber of Commerce. This Vision brings together the aspirations of the partners on a range of issues and identifies a series of actions for the next few years. Some of these are relevant to the Local Plan and others are not, because they relate to matters beyond the remit of the planning system (e.g. starting works on the I-Am Project around the Museum on High Street). The two documents (the statutory 'Local Plan' and the 'Vision for Ipswich') are considered to complement each other in a helpful way.'</u>	For completeness.	Editorial update	The additional paragraph is for completeness and does not change the SA.
CHAPTER 8				
CS1 SUSTAINABLE DEVELOPMENT – CLIMATE CHANGE				
CS1/para 8.13	<p>Delete:</p> <p>The Government continues to work towards the target of achieving zero carbon homes by 2016. A zero carbon home is currently defined as one that delivers zero net carbon over a year from all 'regulated' energy uses which includes heating, hot water, lighting and fixed appliances. The Government is proposing to implement this through setting greater minimum standards for energy efficiency in the Building Regulations which would operate in tandem with 'allowable solutions' whereby developers can select to either incorporate greater efficiencies in the building's fabric,</p>	<p>To reflect the Government's statement contained within the Fixing the Foundations paper (HM Treasury, July 2015) which states that:</p> <p>'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.'</p>	Editorial update	The SA has been reviewed and does not contain reference to the Government's zero carbon homes target therefore no further action is required.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	deliver on- or off-site renewable energy or provide a financial contribution to renewable energy projects elsewhere, or provide a mix of these measures. Ipswich is planning for high levels of housing and employment growth by 2031. This represents a vital opportunity to ensure that this significant addition to the building stock of the Borough minimises its impacts on climate change. Non-residential buildings also offer the opportunity to save emissions and the Government maintains a commitment for non-residential development to be carbon neutral by 2019.	An explanation to this effect is proposed to be incorporated in revised supporting text to DM1.		
CS1/para 8.14	Amend as follows: Policy DM1 in Part C of this document provides more detail as to how sustainable buildings can be delivered in Ipswich through the <u>Code for Sustainable Homes standards for energy and water use</u> for residential development, and BREEAM ratings for non-residential development, in advance of any further Government measures. The Plan is not prescriptive about how developers should achieve these targets. There is a significant amount of existing advice available about sustainable construction.	To reflect the Government's statement contained within the Fixing the Foundations paper as referred to above.	Editorial update	The SA has been reviewed and amended appropriately to remove reference to the Code for Sustainable Homes and the addition of standards for energy and water use.
CS1/para 8.16	Amend as follows:	To reflect the Government's statement contained within the Fixing the Foundations paper as referred to above.	Editorial update Mersea Homes	The editorial update reflects the Government's statement by removing reference to the zero

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>'The National Planning Policy Framework states that Local Authorities should recognise that it is the responsibility of all communities to contribute to energy generation from renewable or low carbon sources, and that they should have a positive strategy to promote energy from renewable and low carbon sources. The Planning and Energy Act 2008 also allows local planning authorities to adopt policies which require developers to meet a proportion of their energy requirements from renewable or low carbon sources, and this is taken forward through policy DM2. The National Planning Policy Framework requires local planning authorities to support the move to a low carbon future and when setting any local requirements for a building's sustainability, to do so in a way consistent with the Government's zero carbon buildings policy and adopted nationally described standards. Policies should be designed to maximise renewable and low carbon energy generation whilst addressing any adverse impacts satisfactorily, including cumulative landscape and visual impacts. Implementation of this policy will help to make a significant impact on reducing carbon emissions because buildings are a major source of emissions in Ipswich, in advance of the zero carbon buildings programme taking effect. Funding streams such as the Feed in Tariff and Renewable Heat Incentive will be promoted to increase the addition of micro-generation equipment on private properties and Borough</p>			<p>carbon buildings programme and does not change the SA.</p>

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>owned properties will also be equipped with micro-generation equipment where possible.'</p> <p>Add new sentence after '...programme taking effect. <u>Once the zero carbon dwellings and zero carbon buildings programmes are in place the Council will reconsider the relevance of the requirements of Policy DM2.</u></p>			
CS2 THE LOCATION AND NATURE OF DEVELOPMENT				
CS2/para 8.31	Amend 2024 to 2025 'Later in the plan period after 2024 <u>2025</u> , the ...'	To reflect the updated baseline to 1 st April 2015.	Editorial update	The amendment is of an editorial nature and does not change the SA.
CS2/para 8.34	<p>Include reference to numbers of District Centres:</p> <p>'... in the key diagram are as follows (<u>with reference numbers for cross reference to the policies map</u>): ...'</p>	For ease of cross reference.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
CS4 PROTECTING OUR ASSETS				
CS4/para 8.42	<p>There are now 20 County Wildlife Sites within the Borough. The 20 sites are: Bourne Bridge Grassland, Alderman Canal, Holywells Park & Canal, Landseer Park Carr, Pipers Vale, Ransomes Industrial Park Road Verges, River Gipping (Ipswich), River Orwell (Ipswich), Rushmere Heath, Stoke Park Wood, Volvo / Raeburn Road Site, Ashground Covert and Alder Carr, Wharfedale Road (Ipswich), Ransomes Europark Heathland, Bourne Park Reedbed, Braziers Wood & Meadow / Pond Hall Carr, Bridge Wood, Chantry Park Beech Water & Meadow, Dales Road Woodland, Christchurch Park</p>	To reflect the current situation.	<p>Editorial update</p> <p>Suffolk County Council</p>	<p>The SA has been reviewed and amended to reflect the additional Count Wildlife Site.</p> <p>Figure 1 Environmental Constraints and Allocations will need to be amended to reflect the additional County Wildlife Site.</p>

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>Amend fifth bullet point as follows: 1920 County Wildlife Sites</p> <p>Amend penultimate bullet as follows: An area of archaeological importance for its Anglo-Saxon remains in central Ipswich <u>remains of all periods in the historic core, particularly Anglo-Saxon deposits</u>; and</p>			
CS4/paras 8.45 and 8.50	<p>Add Water Framework Directive to the list of legislation and brief explanation of the Council's responsibilities to 8.50 as follows:</p> <p><u>'The Anglian River Basin Management Plan sets out measures which aim to achieve the water body status objectives and wider objectives of the European Water Framework Directive. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 require all public bodies, in exercising their functions so far as affecting a river basin district, have regard to the river basin management plan for that district.'</u></p>	For clarity	Environment Agency	The additional text provides clarity of the Council's responsibilities and does not change the SA.
CS4/para 8.46	<p>Para 8.46 to be amended as follows (insert after 'first listed buildings ...':</p> <p><u>This framework of legislation, guidance and policy currently provides comprehensive protection for the assets. Considering first listed buildings, the council will:</u></p> <ul style="list-style-type: none"> <u>• Conserve and enhance the significance of the Borough's heritage assets, their setting and wider townscape in accordance with policy DM8;</u> <u>• Require new development to contribute to local distinctiveness , built form</u> 	For clarity	Historic England	The SA has been reviewed and the assessment of CS4 against objective ET10 has been updated to reflect the addition of this supporting text, albeit this does not change the conclusions of the assessment.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<u>and scale of heritage assets through the use of appropriate design and materials;</u> • <u>Require proposals to demonstrate a clear understanding of the significance of the asset and its wider context, and the potential impact of the development on the heritage asset and its context;</u> • <u>Keep under review potential buildings and structures for statutory protection; and</u> • <u>Prepare and review entries for the joint Suffolk LPA Buildings at Risk register.</u>			
CS4/para 8.52	Add new sentence to the end: <u>'There are also large areas of Inshore Marine Special Protection Area extending eastwards from the Suffolk and Essex Coast, which form part of the marine protected area identified in the East Inshore and East Offshore Marine Plan.'</u>	To acknowledge these areas of SPA.	Marine Management Organisation	The additional text acknowledges these areas of SPA and does not change the SA.
CS4/para 8.53	Delete: National policy obviates the need for a local policy on this matter. Add to end of paragraph: <u>'An Urban Archaeological Database for Ipswich is to be prepared. The Council will prepare a supplementary planning document to summarise information from the Ipswich Urban Archaeological Database and set out archaeological considerations for new developments.'</u>	For clarity	Historic England / Suffolk County Council	The amendment provides clarity regarding the preparation of an Archaeological Database for Ipswich and does not change the SA.
CS4/para 8.55	Amend the second sentence of para 8.55 to read – <u>'Whilst registration offers no additional statutory protection, they are designated heritage assets of considerable significance and an important material consideration in development management.'</u>	For clarity	Historic England	The amendment provides clarity within the supporting text and does not change the SA.
CS6 THE IPSWICH POLICY AREA				

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
CS6/para 8.68	Add to end of paragraph ' <u>The boundary is currently being reviewed and it is possible that a wider Ipswich Policy Area will be more appropriate. Any new boundary would need to be given statutory weight through the production of future Local Plans.</u> '	To clarify that the boundary is currently being reviewed.	Editorial update	The amendment states the boundary is currently being reviewed and does not change the SA.
CS10 IPSWICH GARDEN SUBURB				
CS10/para 8.102	Amend as follows: ' The Council needs to meet the full, objectively assessed needs for housing in the Borough (National Planning Policy Framework paragraph 47) 'Paragraph 47 of the National Planning Policy Framework states that local planning authorities should 'ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out within this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.'	To address concerns that paragraph 47 was not being correctly referred to.	Northern Fringe Protection Group	The amendment addresses concerns that paragraph 47 of the NPPF was not being correctly referred to and does not change the SA.
CS12 AFFORDABLE HOUSING				
CS12	Add new paragraph to explain how 'by total floorspace' will be calculated, as follows: ' <u>The affordable housing floorspace requirement will be calculated by applying the relevant percentage to the total floorspace of dwellings to be provided.</u> '	To clarify how the policy will be applied.	Homes Builders' Federation	The amendment provides clarity of how the policy will be applied and does not change the SA.
CS13 PLANNING FOR JOBS GROWTH				
CS13/para 8.137	Amend reference to Plan for Growth to read Strategic Economic Plan. '... Local Enterprise Partnership Plan for Growth <u>Strategic Economic Plan.</u> '	The LEP's draft Plan for Growth was superseded by the Strategic Economic Plan.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
CS18 STRATEGIC FLOOD DEFENCE				

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
CS18/para 8.186	Amend 8.186 to read, '... unlikely to be in place until <u>the end of 2017.</u> '	For accuracy	Environment Agency	The amendment provides accuracy within the supporting text and does not change the SA.
CS18/para 8.188	Add to end of paragraph: 'As Ipswich Borough Council falls within a <u>neighbouring reporting area, any climate change mitigation measures should reference policy CC1 within the East Offshore and East Inshore Marine Plans.</u> '	For completeness	Marine Management Organisation	The modification is for completeness regarding reference to the East Offshore and East Inshore Marine Plans and does not change the SA.
CS20 KEY TRANSPORT PROPOSALS				
CS20/para 8.201	Add reference to geographical coverage of Travel Ipswich. '... continues to support the Travel Ipswich scheme, <u>which covers the urban area of Ipswich.</u> More details ...'	For clarity	Westerfield Parish Council	The amendment provides clarity regarding the geographical coverage of Travel Ipswich and does not change the SA.
CS20/para 8.209	Add reference to Wet Dock Crossing feasibility study funding after first sentence: 'In March 2015 the New Anglia Local Enterprise obtained funding in order to carry out a feasibility study for the Wet Dock Crossing.'	For completeness.	Ben Gummer MP	The addition of the reference to the Wet Dock crossing feasibility funding study does not change the SA.
CHAPTER 9				
DM1 SUSTAINABLE DESIGN AND CONSTRUCTION				
DM1 Sustainable Design and Construction	Refer to the Housing Quality Mark 'The Building Research Establishment is <u>introducing a Home Quality Mark which is five star rating demonstrating a home's performance in terms of a number of factors including energy use, running costs, air quality, noise, accessibility to amenities, fast and secure internet access and the ease of use of the home by the occupants. The Council encourages applicants to consider achieving a high rating under the Housing Quality Mark.</u> '	To reflect the introduction of the Home Quality Mark	Editorial Update	Reference to the Home Quality Mark has been made in the assessment against policy ET6 To limit and adapt to climate change, although this does not change the conclusions of the SA.
DM2 DECENTRALISED RENEWABLE OR LOW CARBON ENERGY				

Objection	Reason	Objector(s)	Significance to the SA
<p>effect to Core Strategy a target for achieving carbon energy sources in t builds on national Planning Policy <u>states that planning plays</u> <u>ing the delivery of</u> <u>carbon energy. with the</u> <u>ting to the Government's</u> <u>4.</u></p> <p>nowledged vulnerability of cts of climate change els of development ed to accommodate, the reasonable to require new the given threshold to f 15% of energy demand carbon sources. <u>The</u> <u>Act 2008 allows</u> <u>o require a proportion of</u> <u>opment in their area to</u></p> <p>w carbon sources in the <u>opment. to help achieve</u> <u>ro carbon homes by</u></p>	<p>To reflect withdrawal of Code for Sustainable Homes and withdrawal of allowable solutions and 2016 energy efficiency standards (see Ministerial Statement March 2015 and Fixing the Foundations, July 2015).</p>	<p>HBF, Mersea Homes, Gladman Homes, CBRE, Crest</p>	<p>Reference to the Code for Sustainable Homes has been removed from the SA.</p>

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>2016 (public sector buildings by 2018 and non residential buildings by 2019).²⁵</p> <p>9.18 The policy also provides for some flexibility where it can be clearly demonstrated that achieving the required percentage provision of renewable or low-carbon energy would not be either technically feasible or financially viable in the light of such considerations as site constraints, other planning requirements, development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower percentage provision being achieved where the introduction of additional energy efficiency measures (i.e. additional to those required under the relevant Code for Sustainable Homes or BREEAM requirements as set out in policy DM1 such as passive house design or other inbuilt energy efficiency measures) to achieve an equivalent reduction in carbon emissions.</p> <p>⁴ The Government is currently looking at the definition of what zero carbon is.</p>			
DM3 PROVISION OF PRIVATE OUTDOOR AMENITY SPACE IN NEW AND EXISTING DEVELOPMENTS				

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
DM3/para 9.22	Replace 'rear' with 'private'. 'It is considered that a suitably designed 75 sq. m rearprivate garden should be ...'	For consistency with DM3 which now refers to private garden space rather than rear garden space.	Editorial update	The amendment is of an editorial nature and does not change the SA.
DM8 HERITAGE ASSETS AND CONSERVATION				
DM8/para 9.73	Amend text: <u>'The settlement of Ipswich has developed through Saxon, Medieval and later periods, leaving a legacy of history below ground which tells the complex story of the town's evolution. To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damaged, the planning process must ensure that development proposals respect archaeologically important sites.'</u> The NPPF sets out specific requirements for assets with archaeological interest. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, developers will be required to submit an appropriate desk based assessment and, where necessary, a field evaluation (which could include geophysical survey, building survey and trenched evaluation) at an appropriate stage prior to determination of an application. Scheduled Monuments are designated by the Secretary of State and the records held by English HeritageHistoric England who develop policies to protect them. Suffolk County Council Archaeology Service holds the Historic Environment Record for Ipswich and is consulted on planning applications that	For accuracy	Suffolk County Council	The amendment is of an editorial nature providing accuracy within the supporting text in relation to archaeology and consultation with relevant agencies. It does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	could affect archaeology. <u>Early consultation with relevant agencies is encouraged well in advance of seeking planning permission, in order that assessment and recording requirements can be discussed. This helps make the application process simpler and reduces the risk of heritage assets presenting an obstacle to delivery at a later stage. Where there is no overriding case for preservation in situ, an appropriate programme of work to record and promote understanding of remains which would be affected by development could include some or all of further evaluation, upfront excavation, and/or monitoring and control of contractor's groundworks, with appropriate curation and publication of results.</u>			
DM8/para 9.74	Attention is drawn to the policies maps, which show the Area of Archaeological Importance of the Anglo-Saxon and Medieval town, aspects of which are internationally recognised. Beyond this area, the Borough includes parts of the wider landscape of the Gipping Valley and Orwell Estuary, and there are Prehistoric, Roman, Anglo-Saxon and other period archaeological sites within its boundaries. The County Council strongly encourages applicants to contact the archaeological service well in advance of seeking planning permission, in order that assessment and recording requirements can be discussed. This helps make the application process simpler and reduces the risk of heritage assets presenting an obstacle to	For accuracy	Suffolk County Council	The amendment provides accuracy in relation to the Area of Archaeological Importance and does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	delivery at a later stage. For information, the Area of Archaeological Importance is also shown on Plan 4.' <u>The Area of Archaeological Importance is defined from evidence of buried archaeology, historic maps and information, standing structures and visual elements of the historic landscape and it highlights the area known or likely to have the most complex and sensitive archaeological deposits. This helps to alert applicants and planning officers to the likely requirements for archaeological investigation, protection and recording to be placed on development, on potentially even the smallest scale below-ground works.</u>			
DM9 BUILDINGS OF TOWNSCAPE INTEREST				
DM9/para 9.75	Amend the first sentence of para 9.75 to read: The Council acknowledges the townscape importance of buildings <u>and structures</u> of local interest which have no other statutory protection, and encourages their retention and upkeep.	For completeness	Suffolk Preservation Society	The amendment is of an editorial nature and does not change the SA.
DM10 PROTECTION OF TREES AND HEDGEROWS				
DM10 Protection of Trees and Hedgerows	Amend 'heath' to 'health' in clause g. '... to ensure the heath <u>health</u> and safety of each specimen ...'	To correct a typographical error.	Editorial update	The amendment is a correction of text and does not change the SA.
DM13 SMALL SCALE INFILL AND BACKLAND RESIDENTIAL DEVELOPMENTS				

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
DM13/para 9.90	Needs to refer to existing or future occupiers. '... and the quality of life of its <u>existing and future</u> inhabitants.'	For clarity.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
DM17 TRANSPORT AND ACCESS IN NEW DEVELOPMENTS				
DM17/para 9.97	Delete reference to Ipswich Transport Strategy. '...In accordance with the Ipswich Transport Strategy 2007 and the Suffolk Local Transport Plan ...'	Superseded by Local Transport Plan 3.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
DM17/para 9.99	Add to the end of 9.99: <u>'The Public Rights of Way network is more than just a means of reducing vehicular traffic. In addition to connecting areas and providing opportunities for physical recreation and social interaction, it provides vital access to services, facilities and the natural environment. In this sense it is a major recreational resource, economic asset and means of promoting mental and physical health. These benefits must be taken into account in the design of development along with the contributions it might make to sustainable routes and open space provision. Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made.'</u>	To ensure Objective 6 is realised in relation to the Rights of Way network.	Suffolk County Council	This addition has been referenced within the assessment of this policy although does not change the SA score.
DM20 THE CENTRAL SHOPPING AREA				

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
DM20/para 9.114	Add to the end of the paragraph: <u>'The Town and Country Planning General Permitted Development Order 2015 introduced new permitted development rights for existing A1 units however the policy remains relevant due to size limitations contained within the new Order.'</u>	To acknowledge the recent changes to the General Permitted Development Order whereby change of use from A1-A3 is now PD but only for units under 150sqm and A1-A2 is also PD.	Editorial update	The amendment acknowledges the recent changes to the GDPO and does not change the SA.
DM21 DISTRICT AND LOCAL CENTRES				
DM21, clause b.	Delete ' Of this 40% ' in clause b. 'Of this 40%, n No more than 20% ...'	To clarify that restriction to 20% A5 uses is 20% of the total frontage.	Planware	The amendment clarifies that restriction to 20% A5 uses is 20% of the total frontage and does not change the SA.
DM21	Delete the reference to prominent position (clause c. i.) (and renumber subsequent clauses). 'i. the unit does not occupy a prominent position in the Centre; ii. i. satisfactory vehicular access ... Qualify c. iii. to indicate that this requirement would only apply to a vacant A1 unit. 'iii. in the case of a vacant unit, the unit has suffered from ...'	For clarity in relation to community uses in district centres.	Suffolk County Council.	The amendment provides clarity in relation to community uses in district centres and does not change the SA.
DM21/9.123	Include reference to numbers of Local Centres: <u>'The local centres are listed below (with reference numbers for cross reference to the policies map): ...'</u>	For ease of cross reference.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
DM21/para 9.129	Add explanatory text to the end of para 9.129 about accessibility (clause f.) outside district and local centres meaning particularly for those without use of a car: <u>'Accessible under clause f of policy DM21 relates to community facilities being</u>	For clarity	Editorial update.	The amendment to the clause does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<u>accessible by a range of transport modes including for those without a car.'</u>			
DM28 PROTECTION OF OPEN SPACES, SPORT AND RECREATION FACILITIES				
DM28 Protection of Open Spaces, Sport and Recreation Facilities	Amendment to clause a. of policy: a. ... , as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 and subsequent update as a result of the Council's Open Space and Biodiversity Policy ; or	The Council may commission other updates from time to time as well as the Open Space and Biodiversity Policy, which may also be relevant.	Editorial update.	The amendment to the clause does not change the SA.
DM33 GREEN CORRIDORS				
DM33 Green Corridors and/or Plan 6	Add green rim elements with the borough boundary to Plan 6.	To clarify the location of the green rim	Editorial update.	The amendment provides clarity of the location of the green rim and does no change the SA.
CHAPTER 11 KEY TARGETS ASSOCIATED WITH PART B				
Chapter 11 Objective 6	Add to indicators: <u>'Mode of travel to work to major employers'</u> and <u>'Mode of travel to work (census)'</u> and delete <u>'Children travelling to school — mode of travel usually used'</u> .	Travel to school is no longer monitored. Mode of travel to major employers is monitored annually by Suffolk County Council. Whilst Census data is only collected every ten years, it will show long term trends.	Editorial update, Northern Fringe Protection Group and Save Our Country Spaces.	The amendment is of an editorial nature acknowledging that mode of travel to school is no longer monitored and adding mode of travel to work to major employers. It does not change the SA.
Chapter 11 Objective 8	Change the wording of the second indicator to read – 'Number of buildings on the <u>Suffolk Buildings at Risk</u> register.' Add further indicator as follows: <u>'Number of buildings and conservation areas on Historic England Heritage Assets at Risk register.'</u> Add Targets as follows: <u>'A decrease in the number of Ipswich buildings at risk on the Suffolk Buildings at</u>	To better monitor impacts on the historic environment.	Historic England	The amendment seeks to better monitor impacts on the historic environment and does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<u>Risk register or no net increase in Ipswich buildings at risk'</u> <u>'A decrease in Heritage Assets at risk on the Historic England register or no net increase in Heritage Assets at risk'</u>			
APPENDICES				
APPENDIX 5 Activities or services relevant to each planning standard charge heading	Add sentence : 'The broad categories of infrastructure to be included in the standard charge are as follows and detailed further in Appendix 5. <u>This does not constitute a precursor to a CIL Regulation 123 List.</u> '	For clarity	Suffolk County Council	The amendment is of an editorial nature and does not change the SA.
APPENDIX 6 Ipswich standards for the provision of open space, sport and recreation facilities	Parks and Gardens 1.42ha <u>1.16ha</u> per 1,000 population Amenity Green Space 0.6ha <u>0.48ha</u> per 1000 population	For accuracy to reflect the evidence.	Editorial	The amendment is of an editorial nature providing accuracy within the open space standards and does not change the SA.
MAPS AND PLANS				
Policies Map	Amend Ipswich Garden Suburb allocation – where the link through to Tuddenham Road is shown, the allocation should be shown as a narrower width.	The adjacent plot to the north east now has planning permission for a bungalow.	Editorial	The amendment does not change the SA.
Policies Map	Amend policy reference against countryside designation to read DM34	For clarity	Editorial	The amendment does not change the SA.
Plan 2 Flood Risk	Update to August 2015 to reflect new information received on the areas at risk of	For clarity.	Editorial	The amendment does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	flooding (no change in the areas affected within Ipswich).			
Plan 3 Conservation Areas	Add the Marlborough Road conservation area.	For completeness	Editorial	The amendment does not change the SA.
Plan 6 Green Corridors	Add the indicative Green Rim to link to policy DM33 k.	For clarity	Editorial	The amendment does not change the SA.