



Habitats Regulations Assessment (HRA) of the Ipswich Borough Local Plan Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review, Final Draft: Addendum relating to Proposed Main Modifications.

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Footprint Contract Reference: 516

Date: 22<sup>nd</sup> July 2021

Version: Final

Recommended Citation: Liley, D. (2021 Habitats Regulations Assessment (HRA) of the Ipswich Borough Local Plan Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review, Final Draft: Addendum relating to Proposed Main Modifications. Unpublished report by Footprint Ecology.

## Summary

The Conservation of Habitats and Species Regulations 2017 (as amended) require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas. These sites - Special Protection Areas, Special Areas of Conservation and Ramsar sites - are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).

An HRA asks very specific questions of a plan. Firstly, it 'screens' the plan to identify if there is a risk that certain policies or allocations may have a 'likely significant effect' on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an 'appropriate assessment' to find out if the plan will have an 'adverse effect on the integrity' of the European sites.

Following an appropriate assessment, a Plan may only be adopted if an adverse effect on the integrity of the site can be ruled out.

This document is an addendum to the HRA for the Ipswich Borough Council Local Plan Review at Final Draft stage (undertaken in January 2020, with an addendum in May 2020 that reviewed additional pieces of evidence relating to air quality and flood risk) and has been produced alongside the Main Modifications to the Site Allocations and Policies (Incorporating the IP-One Area Action Plan) Development Plan Document (DPD) Review Final Draft. This update should be read alongside the 2020 HRA report, which was able to conclude that the Plan would not result in adverse effects on European site integrity.

Following Main Modifications of the Core Strategy, the previous HRA conclusions have been checked and all Main Modifications reviewed. None of the Main Modifications change the previous conclusions or findings of the HRA of the Final Draft Plan.

As such, adverse effects on integrity, alone or in-combination are ruled out for all European sites as a result of the Plan at Main Modifications to the Site Allocations and Policies (Incorporating the IP-One Area Action Plan) DPD.

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## Acknowledgements

Thanks to Anna Roe at Ipswich Borough Council for provision of background material, provision of the draft modifications and comments.

## 1. Introduction

- 1.1 The Ipswich Borough Council Local Plan Review 2018-2036 (the Plan) was submitted to the Secretary of State for independent examination on the 10<sup>th</sup> June 2020. Following the close of the Examination Hearing, on the 16<sup>th</sup> December 2020, the Inspectors wrote to the Council setting out their initial views on the next steps for the examination. This includes public consultation on the Main Modifications identified and discussed during the hearing that are required to make the Plan legally compliant or sound.
- 1.2 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. The most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019<sup>1</sup>) take account of the UK's departure from the EU.
- 1.3 The Habitats Regulations require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas<sup>2</sup>. Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).
- 1.4 The HRA for the Plan was finalised in January 2020 (with a subsequent addendum in May 2020 that specifically reviewed further evidence relating to air quality and flood risk) and concluded that at a plan level, the Local Plan Review 2018-2036 will not result in adverse effects on European site integrity. The 2020 HRA covered both the Core Strategy and Policies DPD and the Site Allocations and Policies (incorporating the IP-One Area Action Plan) DPD Review. This report is a review of the proposed Main Modifications to the above document to check whether these proposed main modifications (MMs) influence findings of the previous HRA. This report should therefore be read alongside the previous 2020

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<sup>1</sup> The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

<sup>2</sup> Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations, see <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> (accessed 24 May 2021)

HRA report and the subsequent addendum in May 2020. There is also a separate addendum covering the MMs that relates to the Core Strategy and Policies DPD.

- 1.5 All Modifications to the Site Allocations and Policies DPD have been checked. Appendix 1 summarises the schedule of the MMs to the Site Allocations and Policies DPD with an additional column to record whether the modification has any implications with respect to the 2020 HRA and May 2020 addendum. This provides a record that all modifications have been checked. Section 2 of this report draws from the Appendix and summarises the findings.

## 2. Implications of Site Allocations and Policies (incorporating the IP-One Area Action Plan) DPD Review - Proposed Modifications on the 2020 HRA of the Local Plan

2.1 The MMs encompass a large volume of format changes to the DPD, ensuring all major mixed-use sites and sites requiring master planning are pulled out from previous policies to have policies of their own. All Opportunity Area guidance is now policy. All site sheets have been deleted and replaced with constraints added to each site. All policies referring to the IP-One Area have been moved together. An abbreviated version of the schedule of MMs is provided in Appendix 1 with the implications for each change (with respect to the 2020 HRA and May 2020 addendum) considered.

### Overall housing growth

2.2 The overall level of housing growth as assessed in the 2020 HRA has changed following Main Modifications. The HRA implications of these changes<sup>3</sup> have been considered against the earlier HRA and HRA addendum for the Core Strategy DPD Proposed Modifications, which concluded that the MM changes had not affected the previous conclusions or findings of the earlier HRA of the Final Draft Plan.

### Additional sites and changes to numbers of dwellings at individual sites

2.3 Changes to individual sites are summarised in Table 1. This has been produced to check for changes in the amount of growth at individual sites or for the insertion of new (additional) sites not previously included in the 2020 HRA. That check has indicated negligible changes in the level of housing growth at individual sites<sup>4</sup> and the following sites which were not included in the 2020 HRA:

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<sup>3</sup> A change in the overall numbers of dwellings from 8010 to at least 8280 (2018-2036) as set out in modifications to policy CS7 and the supporting text and tables.

<sup>4</sup> The numbers of dwellings has been changed for 16 sites, see Table 1 and in some cases this is a reduction.

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- IP280 (included within New Policy Land with Planning Permission or Awaiting a Section 106 Agreement Outside the IP-One Area, Westerfield House, Humber Doucy Lane with permission for 177 dwellings (equivalent care home bed-dwellings).
- IP084a included within New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area. This site is County Hall, St. Helen's Street and is for 40 dwellings.
- IP386 included within New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area. This site is 28-50 Grimwade Street and is for 13 net dwellings.
- IP274 included within Policy SP3 Site with planning permission/ awaiting S106. This site 0.39ha and is for 11 units.

2.4 All of the above have been granted planning permission and have therefore been subject to HRA. The inclusion of the above sites in the Site Allocations and Policies (incorporating the IP-One Area Action Plan) DPD Review does not affect the overall 2020 HRA conclusions.

2.5 In addition, IP048d is also a 'new' site that is added to the MMs, but this was assessed in the 2020 HRA as part of IP048a (which is now reduced in area) so that IP048d is for 0.42ha for the school only. Splitting the site has no implications for the 2020 HRA conclusions.

2.6 The 2020 HRA and May 2020 addendum identified risks relating to air and water pollution, water resources, recreation and urbanisation impacts and these were the topics taken to appropriate assessment.

2.7 In terms of recreation, mitigation has been established strategically (the Recreational Disturbance Avoidance and Mitigation Strategy, 'RAMS'), which ensures it is possible to rule out adverse effects on integrity, alone or in-combination for all sites. All residential development will therefore require appropriate assessment and a means to deliver mitigation is secured to address in-combination effects.

2.8 With respect to urbanisation, the MMs do not include any change in very close proximity to the European site boundary. The sites identified in bullets above are all over 1,500m from the Stour and Orwell SPA/Ramsar boundary and risks from urbanisation effects do not need any further consideration.

2.9 The MMs include new wording relating to specific sites and the need for project level HRA to ensure urbanisation effects (and other issues relating to the particular close proximity to the Stour and Orwell Estuaries SPA/Ramsar are addressed) - above and beyond the requirement to contribute to the RAMs. The



relevant sites were all identified in the 2020 HRA which recommended the need for project level assessment and the MMs ensure this issue is fully addressed.

Relevant sites are:

- IP067a Former British Energy Site;
- IP067b Former British Energy Site;
- IP150b,c,d,e and IP152 (New Policy Sites off Nacton Road, South Ravenswood);
- IP064a (Land between Holywells Road and Holywells Park);
- IP080 240 Wherstead Road;
- IP045 Land bounded by Toller Road, Cliff Lane and Holywells Road;
- IP226 Helena Road/Patteson Road.

2.10 The 2020 HRA and addendum was able to rule out adverse effects on integrity as a result of the Plan alone, or in-combination with other plans or projects, as a result of water issues (including water supply, water quality and flood risk) and air quality. The modifications to the plan do not pose any credible further risk and the 2020 HRA conclusions remain relevant. No additional mitigation, above and beyond that already set out in the 2020 HRA is required.

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**Table 1: Sites in Final Draft Plan Stage HRA (see table 4 in the HRA) and changes in the Main Modifications (MMs). Distance to Stour & Orwell Estuaries SPA taken from table 4 in HRA and is the distance from edge of site to the nearest part of the SPA, as the crow flies. Blue shading in the Dwellings MMs column indicate those sites where the number of dwellings has changed.**

Distance to Stour & Orwell Estuaries SPA (km)	Site ref	Address	Policy in Final Draft Review	Allocation	Dwellings 2020 HRA	Dwellings MMs	Changes in MMs
2.425	IP003	Waste tip and employment area north of Sir Alf Ramsey Way	SP2	Land allocated for residential use	114	114	Deleted from SP2. New Policy Waste Tip and Employment Area North of Sir Alf Ramsey Way (IP003).
2.319	IP004	Bus Depot, Sir Alf Ramsey Way	SP2	Land allocated for residential use	48	48	Deleted from SP2. New Policy Bus Depot, Sir Alf Ramsey Way (IP004).
2.319	IP004	Bus Depot, Sir Alf Ramsey Way	SP5	Land allocated for employment use	0	0	Deleted from SP5. New Policy Bus Depot, Sir Alf Ramsey Way (IP004).
5.543	IP005	Former Tooks Bakery, 731 Old Norwich Road	SP3	Land with planning permission	60	60	Constraints added to SP3.
5.543	IP005	Former Tooks Bakery, 731 Old Norwich Road	SP7	Land allocated for community use	0	0	Deleted from SP7.
3.836	IP009	Victoria Nurseries, Westerfield Road	SP2	Land allocated for residential use	12	12	Constraints added to SP2
2.172	IP010a	Former Co-op Depot, Felixstowe Road	SP7	Land allocated for community use	0	0	Deleted from SP7. New policy Felixstowe Road (IP010).
2.172	IP010a	Former Co-op Depot, Felixstowe Road	SP2	Land allocated for residential use	75	137	Deleted from SP2. New policy Felixstowe Road (IP010). Number of dwellings increased to 137.
2.086	IP010b	Felixstowe Road (237 to 297)	SP2	Land allocated for residential use	62	62	Deleted from SP2. New policy Felixstowe Road (IP010), combining IP010a and b.
2.100	IP011a	Lower Orwell Street, Former Gym and Trim (formerly Smart Street/Foundation Street)	SP2	Land allocated for residential use	18	18	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.

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Distance to Stour & Orwell Estuaries SPA (km)	Site ref	Address	Policy in Final Draft Review	Allocation	Dwellings 2020 HRA	Dwellings MMs	Changes in MMs
2.029	IP011b	Smart Street (south)/Foundation St	SP2	Land allocated for residential use	56	56	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
2.096	IP011c	Smart Street/Foundation Street (north)	SP2	Land allocated for residential use	7	7	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
2.187	IP012	Peter's Ice Cream, Grimwade Street	SP2	Land allocated for residential use	35	35	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
1.911	IP014	Hope Church, Fore Hamlet	SP2	Land allocated for residential use	23	25	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints. Capacity amended to 25. Timescale moved from medium to short term
1.940	IP015	West End Road Surface Car Park	SP2	Land allocated for residential use	67	67	Deleted from SP2. New Policy Opportunity Area F – River and Princes Street Corridor. New Policy West End Road Surface Car Park (IP015).
2.035	IP015	West End Road Surface Car Park	SP17	Land allocated for car park	0	0	New Policy Opportunity Area F – River and Princes Street Corridor. New Policy West End Road Surface Car Park (IP015).
1.989	IP028b	Jewson Ltd, Greyfriars Road IP1 1UP	SP4	Land with the potential for housing-led redevelopment	40	40	Constraints added. Uses amended to reflect changes to Use Classes Order – restaurants and cafes, drinking establishments, hot food takeaways and/or indoor sport, recreation or fitness, office/F2.
4.630	IP029	Land Opposite 674-734 Bramford Road	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. New Policy Land Opposite 674-734 Bramford Road (IP029)

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4.630	IP029	Land Opposite 674-734 Bramford Road	SP5	Land allocated for employment use	0	0	Deleted from SP5. New Policy Land Opposite 674-734 Bramford Road (IP029)
1.759	IP031a	Car Park, Burrell Road	SP2	Land allocated for residential use	20	20	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
1.759	IP031b	22 Stoke Street IP2 8BX	SP2	Land allocated for residential use	18	31	Deleted from SP2. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints. Capacity has increased to 31 dwellings.
5.606	IP032	King George V Field, Old Norwich Road	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. New Policy King George V Playing Field, Old Norwich Road (IP032)
5.606	IP032	King George V Field, Old Norwich Road	SP2	Land allocated for residential use	99	99	Deleted from SP2. New Policy King George V Playing Field, Old Norwich Road (IP32).
4.069	IP033	Land at Bramford Road (Stock's site)	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. New Policy Land at Bramford Road (Stock's site) (IP033).
4.069	IP033	Land at Bramford Road (Stock's site)	SP2	Land allocated for residential use	55	55	Deleted from SP2. New Policy Land at Bramford Road (Stock's site) (IP033).
1.973	IP035	Key Street/Star Lane/Burtons (St Peters Port)	SP2	Land allocated for residential use	86	86	Deleted from SP2. New Policy Key Street/Star Lane/Burton's (IP035).
1.322	IP037	Island Site	SP2	Land allocated for residential use	421	421	Deleted from SP2. Included in New Policy Opportunity Area A – Island Site and surrounding area and New Policy The Island Site (IP037).
1.322	IP037	Island Site	SP6	Land allocated for open space, leisure	0	0	Policy SP6 deleted in its entirety. Included in New Policy Opportunity Area A – Island Site and surrounding area and New Policy The Island Site (IP037).

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1.322	IP037	Island Site	SP7	Land allocated for community use.	0	0	Deleted from SP7. Included in New Policy Opportunity Area A – Island Site and surrounding area and New Policy The Island Site (IP037).
1.676	IP039a	Land between Gower Street and Great Whip Street	SP2	Land allocated for residential use	45	45	Deleted from SP2. Included in New Policy Opportunity Area A – Island Site and surrounding area and New Policy Housing Allocations in the IP-One Area which also sets out constraints.
2.564	IP040	Former Civic Centre, Civic Drive	SP10	Land allocated for retail use	0	0	Deleted from SP10. New Policy Former Civic Centre, Civic Drive (Westgate) (IP040).
2.564	IP040	Former Civic Centre, Civic Drive	SP2	Land allocated for residential use	59	59	Deleted from SP2. New Policy Former Civic Centre, Civic Drive (Westgate) (IP040).
2.481	IP041	Former Police Station, Civic Drive	SP2	Land allocated for residential use	58	58	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
1.059	IP042	Land between Cliff Quay and Landseer Road	SP3	Land with planning permission	222	222	Deleted from SP3. New Policy Land between Cliff Quay and Landseer Road (IP042). Site area increased to 2.06ha.
2.024	IP043	Commercial Buildings, Star Lane	SP2	Land allocated for residential use	50	50	Deleted from SP2. New Policy Commercial Building, Star Lane (IP043).
2.024	IP043	Commercial Buildings, Star Lane	SP5	Land allocated for employment use	0	0	Deleted from SP5. New Policy Commercial Building, Star Lane (IP043).
1.326	IP045	Land bounded by Cliff/Toller/Holywells Road	SP4	Land with the potential for housing-led redevelopment	148	148	Constraints added.
1.837	IP047	Land at Commercial Road	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. New Policy Land at Commercial Road (IP047).
1.837	IP047	Land at Commercial Road	SP2	Land allocated for residential use	173	173	Deleted from SP2. New Policy Land at Commercial Road (IP047).

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2.311	IP048a	Mint Quarter/Cox Lane East Regeneration Area	SP2	Land allocated for residential use	53	53	Deleted from SP2. New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d).
2.311	IP048a	Mint Quarter/Cox Lane East Regeneration Area	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d)
2.405	IP048a	Mint Quarter/Cox Lane East Regeneration Area	SP7	Land allocated for community use	53	53	Deleted from SP7. New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d). Site area reduced from 1.33ha to 0.94ha to separate out the primary school element into IP048d. Site mix now 60% resi & 40% short say car park and open space. Capacity still 53.
2.322	IP048b	Mint Quarter/Cox Lane West Regeneration Area	SP2	Land allocated for residential use	36	36	Deleted from SP2. New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d).
2.322	IP048b	Mint Quarter/Cox Lane West Regeneration Area	SP10	Land allocated for retail use	0	0	New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d).
2.322	IP048b	Mint Quarter/Cox Lane West Regeneration Area	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. New Policy Opportunity Area C – Mint Quarter/Cox Lane

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							regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d).
2.384	IP048b	Mint Quarter/Cox Lane	SP17	Land allocated for car park	0	0	New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d).
2.428	IP048c	Mint Quarter/Cox Lane West	SP3	Land with planning permission	33	33	Deleted from SP3. New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration area and surrounding area and New Policy SP25 The Mint Quarter (IP048a-d).
1.839	IP049	Shed 8, Orwell Quay	SP12	Land allocated for education and ancillary use/ waterfront use	0	0	New Policy Opportunity Area D – Education Quarter and surrounding area
1.875	IP049	Shed 8, Orwell Quay	SP17	Land allocated for car park	0	0	New Policy Opportunity Area D – Education Quarter and surrounding area
2.204	IP051	Old Cattle Market, Portman Road (south)	SP5	Land allocated for employment use	0	0	Deleted from SP5. New Policy Opportunity Area F – River and Princes Street Corridor. New Policy Old Cattle Market, Portman Road (IP051).
2.275	IP051	Old Cattle Market, Portman Road (south)	SP17	Land allocated for car park/hotel/leisure	0	0	New Policy Opportunity Area F – River and Princes Street Corridor. New Policy Old Cattle Market, Portman Road (IP051).
2.054	IP052	Land between Lower Orwell Street & Star Lane	SP4	Land with the potential for housing-led redevelopment	29	29	Constraints added.
2.067	IP054a	30 Lower Brook Street	SP3	Land with planning permission	62	62	Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints.

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2.034	IP054b	Land between Old Cattle Market and Star Lane	SP2	Land allocated for residential use	40	40	Deleted from SP2. New Policy Land between Old Cattle Market and Star Lane (IP054b).
3.277	IP059	Arclion House and Elton Park, Hadleigh Road	SP3	Land with planning permission	103	103	Constraints added to SP3.
2.875	IP061	Former school site, Lavenham Road	SP2	Land allocated for residential use	23	23	Deleted from SP2. New Policy Former School Site, Lavenham Road (IP061)
2.875	IP061	Former school site, Lavenham Road	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. New Policy Former School Site, Lavenham Road (IP061).
1.488	IP064a	Land between Holywells Road and Holywells Park	SP2	Land allocated for residential use	66	66	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
1.951	IP066	J J Wilson, White Elm Street	SP2	Land allocated for residential use	55	55	Constraints added to SP2.
0.515	IP067a	Former British Energy Site, Cliff Quay	SP2	Land allocated for residential use	17	17	Constraints added to SP2.
0.398	IP067b	Former British Energy Site, Cliff Quay	SP5	Land allocated for employment use	0	0	Constraints added to SP5.
2.391	IP074	Land at Upper Orwell Street	SP3	Land with planning permission	9	9	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, which also sets out constraints.
0.845	IP080	240 Wherstead Road	SP2	Land allocated for residential use	27	27	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints. Now anticipated medium term not short term.



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1.917	IP083	Banks of river, upriver from Princes Street	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. Site included in New Policy Land Allocated and Protected as Open Space in the IP-One Area.
3.247	IP088	79 Cauldwell Hall Road	SP3	Land with planning permission	17	17	Deleted from SP3.
2.168	IP089	Waterworks Street	SP2	Land allocated for residential use	23	23	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
2.093	IP094	Rear of Grafton House, Russell Road	SP5	Land allocated for employment use	0	0	Included in New Policy Land allocated for Employment Use in the IP One Area.
2.583	IP096	Car Park, Handford Road	SP2	Land allocated for residential use	22	22	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints. Timescale moved from medium to short.
1.518	IP098	Transco, south of Patteson Road	SP2	Land allocated for residential use	62	62	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints. Timescale moved from medium to medium/ long.
3.231	IP105	Depot, Beaconsfield Road	SP2	Land allocated for residential use	15	15	Constraints added to SP2.
3.772	IP106	391 Bramford Road	SP3	Land with planning permission	11	11	Constraints added to SP3.
3.589	IP109	Rear of Jupiter Road and Reading Road	SP3	Land with planning permission	13	6	Constraints added to SP3. Capacity amended to 6 dwellings.
2.328	IP116	St Clement's Hospital Grounds	SP3	Land with planning permission	108	46	Constraints added to SP3. Capacity amended to 46 to reflect build out dwellings.

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2.457	IP119	Land east of West End Road	SP2	Land allocated for residential use	28	28	Deleted from SP2. New Policy Land east of West End Road (IP119)
2.457	IP119	Land east of West End Road	SP5	Land allocated for employment use			Deleted from SP5. New Policy Land east of West End Road (IP119)
2.386	IP120b	Land west of West End Road	SP2	Land allocated for residential use	103	103	Deleted from SP2. New Policy Housing Allocations in the IP-One Area.
0.774	IP125	Corner of Hawke Road and Holbrook Road	SP2	Land allocated for residential use	15	15	Constraints added to SP2.
3.065	IP129	BT Depot, Woodbridge Road	SP7	Land allocated for community use	0	0	Constraints added to SP7.
3.426	IP131	Milton Street	SP3	Land with planning permission	9	9	Constraints added to SP3. Now anticipated short term rather than medium term.
1.912	IP132	Former St Peters Warehouse site, 4 Bridge Street	SP2	Land allocated for residential use	73	73	Deleted from SP2. New Policy Former St Peter's Warehouse, 4 Bridge Street (IP132).
1.912	IP132	Former St Peters Warehouse site, 4 Bridge Street	SP5	Land allocated for employment use	0	0	Deleted from SP5. New Policy Former St Peter's Warehouse, 4 Bridge Street (IP132).
1.537	IP133	South of Felaw Street	SP2	Land allocated for residential use	45	45	Deleted from SP2. Included in New Policy Opportunity Area A – Island Site and surrounding area and New Policy New Policy Housing Allocations in the IP-One Area.
3.325	IP135	112-116 Bramford Road	SP2	Land allocated for residential use	19	19	Constraints added to SP2.
1.905	IP136	Silo, College Street	SP2	Land allocated for residential use	48	48	Deleted from SP2. New Policy Silo, College Street (IP136).
6.099	IP140	Land north of Whitton Lane	SP5	Land allocated for employment use	0	0	Constraints added to SP5.

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Distance to Stour & Orwell Estuaries SPA (km)	Site ref	Address	Policy in Final Draft Review	Allocation	Dwellings 2020 HRA	Dwellings MMs	Changes in MMs
1.702	IP141a	Land at Futura Park, Nacton Road	SP5	Land allocated for employment use	0	0	Constraints added to SP5.
1.748	IP142	Duke Street	SP6	Land allocated for open space	0	0	Policy SP6 deleted in its entirety. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints. Now anticipated short term.
1.748	IP142	Duke Street	SP3	Land with planning permission	44	44	Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints.
0.459	IP143	Former Norsk Hydro, Sandy Hill Lane	SP2	Land allocated for residential use	85	85	Deleted from SP2. Added to SP3. Planning permission approved.
0.001	IP149	Land at Pond Hall Farm	SP8	Land allocated for country park extension	0	0	Further details added to SP8.
1.115	IP150a	Areas U, V & W, Ravenswood	SP3	Land with planning permission	94	96	Added to SP3. Number of dwellings changed from 94 to 96.
0.750	IP150b	Land south of Ravenswood	SP7	Land allocated for outdoor sport or recreational uses within Use Class F2(c)	0	0	Deleted from SP7. Included in new Policy, Sites off Nacton Road, South Ravenswood. Use changed from Sports Park to "for outdoor sport or recreational uses within Use Class F2(c)"
1.339	IP150c	Land south of Ravenswood	SP5	Land allocated for employment use	0	0	Deleted from SP5. Included in new Policy, Sites off Nacton Road, South Ravenswood.
1.029	IP150d	Land south of Ravenswood (west - Sports Park)	SP2	Land allocated for residential use	34	34	Deleted from SP2. Included in new Policy, Sites off Nacton Road, South Ravenswood.
1.184	IP150e	Land south of Ravenswood	SP2	Land allocated for residential use	126	126	Deleted from SP2. Included in new Policy, Sites off Nacton Road, South Ravenswood.
0.993	IP152	Airport Farm Kennels, north of A14	SP5	Land allocated for employment use	0	0	Deleted from SP5. Included in new Policy, Sites off Nacton Road, South Ravenswood.

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3.523	IP161	2 Park Road	SP3	Land with planning permission	14	14	Constraints added to SP3.
4.360	IP165	Eastway Business Park, Europa Way	SP3	Land with planning permission	78	8	Constraints added to SP3. Under construction 8 dwellings outstanding.
1.811	IP169	23-25 Burrell Road	SP3	Land with planning permission	4	4	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints.
2.643	IP172	15-19 St Margaret's Green	SP2	Land allocated for residential use	9	9	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
1.811	IP188	Websters Saleyard site, Dock Street	SP2	Land allocated for residential use	9	9	Deleted from SP2. Included in New Policy Opportunity Area A – Island Site and surrounding area and New Policy Land with Planning Permission or Awaiting a Section 106 in the IP-One Area, with constraints.
1.120	IP200	Bath Street (Griffin Wharf)	SP3	Land with planning permission	113	71	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints.
1.899	IP205	Burton's College Street	SP3	Land with planning permission	14	9	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints. Moved from short/medium to short term.
1.885	IP206	Cranfields	SP3	Land with planning permission	134	134	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section

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							106 Agreement in the IP-One Area, with constraints. Moved from short to short/medium term.
1.897	IP211	Regatta Quay	SP3	Land with planning permission	156	156	Deleted from SP3.
2.658	IP214	Old Foundry Road	SP3	Land with planning permission	12	12	Deleted from SP3.
5.037	IP221	The Flying Horse, PH, 4 Waterford Road	SP2	Land allocated for residential use	12	12	Constraints added to SP2. Now anticipated in medium term.
1.370	IP226	Helena Road	SP4	Land with the potential for housing-led redevelopment	337	337	Constraints added to SP4.
2.498	IP245	12-12a Arcade Street	SP3	Land with planning permission	7	14	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints.
4.231	IP256	Artificial Hockey Pitch, Sports Club, Henley Road	SP3	Land with planning permission	28	28	Constraints added to SP3.
2.562	IP279a	Former British Telecom Offices, Bibb Way	SP3	Land with planning permission	104	78	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints.
2.624	IP279b(1)	Former British Telecom Office, Bibb Way	SP2	Land allocated for residential use	18	35	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area.

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Distance to Stour & Orwell Estuaries SPA (km)	Site ref	Address	Policy in Final Draft Review	Allocation	Dwellings 2020 HRA	Dwellings MMs	Changes in MMs
2.552	IP279b(2)	Former British Telecom Offices, Bibb Way	SP2	Land allocated for residential use	29	37	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
2.375	IP283	25 Grimwade St, Club & Car Park, Rope Walk	SP3	Land with planning permission	14	14	Deleted from SP3. Included in New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area, with constraints.
1.000	IP307	Prince of Wales Drive	SP2	Land allocated for residential use	12	15	Constraints added to SP2. Number of dwellings increased to 15.
1.547	IP309	Bridgeward Social Club, 68a Austin Street	SP2	Land allocated for residential use	15	15	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
2.615	IP347	Mecca Bingo, Lloyds Avenue	SP10	Land allocated for retail use	0	0	Policy reference change to Policy SP10 Retails Site Allocations in the IP-One Area.
2.381	IP348	Upper Princes Street	SP10	Land allocated for retail use	0	0	Policy reference change to Policy SP10 Retails Site Allocations in the IP-One Area.
2.551	IP354	72 (Old Boatyard) Cullingham Road IP1 2EG	SP2	Land allocated for residential use	24	14	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints. Capacity decreased to 14.
2.550	IP355	77-79 Cullingham Road	SP2	Land allocated for residential use	6	6	Deleted from SP2. Included in New Policy Housing Allocations in the IP-One Area which also sets out constraints.
4.830	ISPA4.1	Land at Humber Doucy Lane	ISPA	Land allocated for mixed use	496	449	ISPA4.1 – Capacity reduced from 489 to 449. Site area reduced from 23.62ha to 23.28ha.
3.044	Safeguard	Heath Road Hospital site	CS19	Safeguarded for health	0	0	

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4.048	Urban extension	Ipswich Garden Suburb	CS10	Land allocated for mixed use (outline permissions given)	3500	3500	

### 3. Formal Integrity Test and Conclusions

- 3.1 The Ipswich Borough Council Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD with Proposed Main Modifications has been subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitats Regulations 2017 as amended.
- 3.2 The HRA of the Final Draft Plan (in 2020) concluded that the Plan would not result in adverse effects on integrity for any European site, alone or in-combination with other plans or projects. Following the Site Allocations and Policies DPD Main Modifications, the HRA conclusions have been checked and all Modifications reviewed. None of the Main Modifications change the previous conclusions or findings of the HRA of the Final Draft Plan. As such, adverse effects on integrity, alone or in-combination are ruled out for all European sites.



## Appendix 1: Schedule of Proposed Main Modifications (MMs) to the Site Allocations and Policies (Incorporating the IP-One Area Action Plan) DPD

Proposed Main Modifications to the Site Allocations and Policies DPD of the Local Plan Review and implications in terms of the 2020 HRA. Brown shaded rows in the table reflect new policies (darker brown) or changes to policy wording (paler brown), and as such modifications that are more likely to have implications for the 2020 HRA.

MM Ref	Pg. of Final Draft Local Plan Review	Policy/ Paragraph of Final Draft Local Plan Review	Modification	Reason for modification	Implications for 2020 HRA findings
MM162	3	Paragraph 1.2	Change to general/supporting text	In order to be effective and accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM163	3	Paragraph 1.3	Change to general/supporting text	In order to be effective and accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM164	4	Paragraph 1.10	Change to general/supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM165	11	Paragraph 3.2, Objective 2	Change to an objective	In order to be effective and accord with paragraph 35 of the NPPF. To reflect the publication of the affordability ratios in March 2020 regarding the Standard Method for calculating housing need.	Sets out an increase in the number of dwellings by 270, to 2,820 as per CS7. This increase is considered in the Core Strategy DPD main modifications HRA addendum.
MM166	12	Paragraph 3.2, Objective 10	Change to an objective	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date Standard	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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				Method calculation of housing need, and to ensure it is consistent with national policy.	
MM167	17	Paragraph 4.5	Change to general/supporting text	In order to be effective and accord with paragraph 35 of the NPPF.	Housing numbers are set out in CS7 and have been checked in the Core Strategy DPD main modifications HRA addendum.
MM168	17	Policy SP2	Change to policy wording	In order to be effective and accord with paragraph 35 of the NPPF and the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	No new sites introduced and changes relate to structure of document and provide further detail (constraints). Constraints include reference for site IP067a for need for project level HRA to demonstrate no impacts from urbanisation. No implications with respect to 2020 HRA.
MM169	28	Paragraph 4.7	Change to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	Housing numbers as set out in CS7 and have been checked in the Core Strategy DPD main modifications HRA addendum.
MM170	28	Paragraph 4.8	Change to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM171	29	Paragraph 4.10	Delete supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM172	29	Paragraph 4.11	Change to supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM173	29	Paragraph 4.12	Change to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM175	30	Policy SP3	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	No new sites introduced and changes relate to structure of document and provide further detail (constraints). Constraints include reference for site IP050a for need for HRA screening and appropriate assessment. No implications with respect to 2020 HRA.
MM176	33	Paragraph 4.17	Change to supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM177	34	New Paragraph	New paragraph	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM178	35	Policy SP4	Deletion of policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM179	36	Paragraphs 4.21-4.22	Change to supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM180	N/A	New Policy	New Policy Retail Site Allocation (outside the IP-One Area)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	New policy for retail allocation. No likely significant effects (LSE).
MM181	N/A	New Paragraphs	Change to supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM182	37	Policy SP5	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, to reflect the Town and Country Planning (Use Classes)	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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				(Amendment) (England) Regulations 2020, and for soundness in accordance with paragraph 35 of the NPPF.	
MM183	39	Paragraph 4.23	Change to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM184	39	Paragraph 4.24	Change to supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM185	40	Paragraph 4.26	Change to supporting text	In order to be effective and consistent with national policy. To accord with paragraph 35 of the NPPF and to reflect changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM186	40	New paragraph	Insert new paragraphs	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM187	41	Paragraph 4.27	Delete supporting text	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM188	41	Policy SP6	Deletion of policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. None of the changes affect open space provided as mitigation for recreation impacts to European sites.

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MM189	42	Paragraphs 4.28 to 4.31	Delete supporting text		None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM190	43	Policy SP7	Change to policy – addition of SEND free school and site-specific issues	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM191	44	Paragraph 4.34	Change to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM192	44	Paragraph 4.36	Change to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM193	45	Policy SP8	Change to policy	In order to be effective and to accord with paragraph 35 of the NPPF.	Policy was checked as part of 2020 HRA. Policy provides protection to Stour and Orwell Estuaries SPA/Ramsar through better visitor management. Amendments serve to strengthen policy and as such add strength to the policy in providing mitigation, but do not affect the overall findings of the HRA.
MM194	46	Policy SP9	Deletion of policy	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM195	46 & 47	Paragraphs 4.40 – 4.55	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM196	N/A	New Policy	New Policy Sustainable Travel	In order to be effective and to accord with paragraph 35 of the NPPF.	No LSE. Sustainable travel initiatives may help reduce air quality risks from traffic but are not included here as

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			Infrastructure Outside the IP-One Area		European site mitigation. Policy poses no risks in terms of increased recreation to European sites.
MM197	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM198	N/A	New Paragraph	Change to supporting text.		None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM199	N/A	New Policy	New Policy Sites off Nacton Road, South Ravenswood	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written and unambiguous to accord with paragraph 16 of the NPPF.	No implications for previous HRA findings as sites all checked as part of 2020 HRA.
MM200	N/A	New Paragraphs	Changes to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. New text does include reference for need for project level HRA to demonstrate urbanisation impacts are prevented. This was identified in the 2020 HRA.
MM201	N/A	New Policy	New Policy Felixstowe Road (IP010)	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	Site previously assessed as part of Policy SP7. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM202	N/A	New Paragraphs	Change to supporting text	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM203	N/A	New Policy	New Policy Land Opposite 674-734 Bramford Road (IP029)	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	Site previously assessed as part of Policy SP6. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM204	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM205	N/A	New Policy	New Policy King George V Playing Field, Old Norwich Road (IP032)	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	Site previously assessed as part of Policy SP6. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM206	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM207	N/A	New Policy	New Policy Land at Bramford Road (Stocks site) (IP033)	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	Site previously assessed as part of Policy SP6. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM208	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM209	N/A	New Policy	New Policy Former School Site, Lavenham Road (IP061)	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	Site previously assessed as part of Policy SP6. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM210	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM211	48	Paragraph 5.1	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM212	48	Paragraphs 5.2 and 5.3	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM213	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM214	N/A	New Map and New Paragraphs	Change to supporting text and new map.	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM215	48-49	Paragraph 5.5	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM216	49	Paragraphs 5.7 and 5.8	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM217	50	Policy SP10	Change to policy.	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.



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MM218	51	Paragraph 5.13	Change to supporting text.	To be effective and to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM219	51	Paragraph 5.14	Delete paragraph	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM220	51	Paragraph 5.15	Change to supporting text.	To be effective and to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM221	51	Paragraph 5.16	Change to supporting text.	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM222	52	Policy SP11	Change to supporting text.	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM223	54	Policy SP12	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM224	56	Policy SP13	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM225		New Heading and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM226	67	Paragraph 6.1	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM227		New Plan	New map	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM228	67	Paragraph 6.2	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM229	70-71	A Island Site, Site Analysis & Development Options Plans	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM230	N/A	New Policy	New Policy Opportunity Area A – Island Site and surrounding area	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM231	72	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM232	72-73	Development Opportunities and Development Principles Table	Table removed	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM233	74-75	B-Merchant Quarter Site Analysis and Development Options Plans	Change to plans/maps	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM234	N/A	New Policy	New Policy Opportunity Area B – Merchant Quarter	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	No implications. Opportunity area was assessed previously (were in Chapter 6).
MM235	76	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM236	76-77	Development Opportunities and Principles Table	Table deleted	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM237	78-79	C-Mint Quarter and Surrounding Area Site Analysis and Development Options Plans	Change to plan/map	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM238	N/A	New Policy	New Policy Opportunity Area C – Mint Quarter/Cox Lane regeneration	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	No implications. Opportunity area was assessed previously (were in Chapter 6).

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			area and surrounding area		
MM239	N/A	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM240	80-81	Development Opportunities and Development Principles Table	Table deleted	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM241	82-83	D-Education Quarter and Surrounding Area Site Analysis and Development Options Plans	Change to plan/map	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM242	N/A	New Policy	New Policy Opportunity Area D – Education Quarter and surrounding area	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written and unambiguous to accord with paragraph 16 of the NPPF.	No implications. Opportunity area was assessed previously (were in Chapter 6).
MM243	84	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM244	84-85	Development Opportunities and Development Principles Table	Table deleted	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM245	86-87	E-Westgate Site Analysis and Development Options Plans	Change to plan/map	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM246	N/A	New Policy	New Policy Opportunity Area E – Westgate	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	No implications. Opportunity area was assessed previously (were in Chapter 6).
MM247	88	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM248	88-89	Development Opportunities and Development Principles Table	Table deleted	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM249	90-91	F-River and Princes Street Corridor Site Analysis and	Change to plan/map	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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		Development Options Plans			
MM250	N/A	New Policy	New Policy Opportunity Area F – River and Princes Street Corridor	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	No implications. Opportunity area was assessed previously (were in Chapter 6).
MM251	92	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM252		Development Opportunities and Development Principles Table	Table deleted	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM253	94-95	G-Upper Orwell River and Canalside Site Analysis and Development Options Plans	Change to plan/map	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM254	N/A	New Policy	New Policy Opportunity Area G – Upper Orwell River and Canalside	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	No implications. Opportunity area was assessed previously (were in Chapter 6).

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MM255	96	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM256	96	Development Opportunities and Development Principles Table	Table deleted	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM257	98-99	H-Holywells Site Analysis and Development Options Plans	Change to plan	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM258	N/A	New Policy	New Policy Opportunity Area H – Holywells	In order to be effective and to accord with paragraph 35 of the NPPF and to ensure that policies are clearly written an unambiguous to accord with paragraph 16 of the NPPF.	No implications. Opportunity area was assessed previously (were in Chapter 6).
MM259	100	Existing and New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM260	100-101	Development Opportunities and Development Principles Table	Table deleted	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM261	58	Policy SP15	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM262	61	Policy SP16	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM263	63	Policy SP17	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM264	64	Paragraph 5.50	Change to supporting text.	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM265	64	Paragraph 5.51	Change to supporting text.	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM266	65	Paragraph 5.52	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM267	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.



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MM268	N/A	New Policy	New Policy Housing Allocations in the IP-One Area	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	No new sites introduced, and changes relate to structure of document and provide further detail (constraints). Constraints include reference for sites IP064a and IP80 to need project level HRA to demonstrate no impacts from urbanisation. No implications with respect to 2020 HRA.
MM269	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM270	N/A	New Policy	New Policy Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	No new sites introduced, and changes relate to structure of document and provide further detail (constraints). No HRA implications.
MM271	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM272	35	Policy SP4	Change to policy	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM273	36	New paragraphs	Insert new paragraphs	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM274	N/A	New Policy	New Policy Land allocated for Employment Use in the IP One Area	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	No new sites introduced, and changes relate to structure of document and provide further detail (constraints). No HRA implications.

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MM275	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM276	N/A	New Policy	New Policy Land Allocated and Protected as Open Space in the IP-One Area	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM277	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM278	N/A	New introductory text	Change to supporting text.	To accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM279	N/A	New Policy	New Policy Waste Tip and Employment Area North of Sir Alf Ramsey Way (IP003)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM280	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM281	N/A	New Policy	New Policy Bus Depot, Sir Alf Ramsey Way (IP004)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM282	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM283	N/A	New Policy	New Policy West End Road Surface Car Park (IP015)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM284	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM285	N/A	New Policy	New Policy Key Street/Star Lane/Burton's (IP035)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM286	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM287	N/A	New Policy	New Policy Former Civic Centre, Civic Drive (Westgate) (IP040)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP10. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM288	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM289	N/A	New Policy	New Policy Land between Cliff Quay	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP3. The modification does not result in any changes to the

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			and Landseer Road (IP042)		proposed quantum or location of development or affect the HRA findings in any way.
MM290	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM291	N/A	New Policy	New Policy Commercial Building, Star Lane (IP043)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP5. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM292	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM293	N/A	New Policy	New Policy Land at Commercial Road (IP047)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM294	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM295	N/A	New Policy	New Policy Old Cattle Market, Portman Road (IP051)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP5. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM296	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM297	N/A	New Policy	New Policy Land between Old Cattle Market and Star Lane (IP054b)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM298	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM299	N/A	New Policy	New Policy Land east of West End Road (IP119)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP5. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM300	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM301	N/A	New Policy	New Policy Former St Peter's Warehouse, 4 Bridge Street (IP132)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP5. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM302	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM303	N/A	New Policy	New Policy Silo, College Street (IP136)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP2. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM304	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM305	N/A	New Policy	New Policy The Island Site (IP037)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Site previously assessed as part of Policy SP6. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM306	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. Additional text does include reference to the need for project level HRA to check for urbanisation impacts. This was identified in the 2020 HRA.
MM307	N/A	New Policy	New Policy SP25 The Mint Quarter (IP048a-d)	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	Sites previously assessed as part of Policy SP2, SP6 and SP7. The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM308	N/A	New Paragraphs	Change to supporting text.	In order to be effective and to accord with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM309	102-103	Part D & Chapter 7	Deletion of text and chapter	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM310	105	Appendix 1	Delete appendix	<u>In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</u>	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM311	106	Appendix 2	Delete appendix	<u>In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</u>	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM312	107-264	Appendix 3 – Site Allocation Details (3A) and Site Sheets (3B)	Deletion of appendix	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM313	265-273	Appendix 4 – Opportunity Site – Site Sheets	Deletion of appendix	In order to be effective and to accord with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.