



# Strategic Environmental Assessment and Sustainability Appraisal

Focused Review of the Core Strategy and Policies  
Development Plan Document

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Interim SA Report



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## Ipswich Borough Council

# Strategic Environmental Assessment and Sustainability Appraisal

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

### Interim SA Report

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# ABBREVIATIONS

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

# 1 INTRODUCTION

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

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

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

Figure 1-1 Ipswich Borough Council map



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

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

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

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

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

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

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



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

## 1.2 Background to and Purpose of the SA Report

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

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

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

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

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

## 1.3 Structure of this SA Report

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

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

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

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

## 2 SUSTAINABILITY APPRAISAL

### 2.1 Legal Requirements

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

### 2.2 Stages in the SA Process

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

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

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

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

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

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

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

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

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

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

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

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

*The SEA Directive requires that the SEA covers:*

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

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

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

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

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

#### International Plans and Programmes

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

#### National Plans and Programmes

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

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

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

## Regional Level Plans

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

## Local Policy

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

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

## Key Results from the Review

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

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



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

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

## The Sustainability Baseline and Key Sustainability Issues

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

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

*The SEA Directive requires that the SEA covers:*

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

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

## Methodology

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

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

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

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

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

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

### Key Sustainability Issues and Opportunities

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

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

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

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

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

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

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

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



## The SA Framework

### Background to the SA Framework

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

### Development of the Sustainability Objectives

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

**Table 2-3 The SA Framework**

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

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

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

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

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

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

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



## SA Objective Compatibility

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

The following notations are used in Table 2-4:

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

Table 2-4 Internal Compatibility of SA Objectives

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

## SA Scoping Report

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

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

### Geographical Scope of the Appraisal

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

### Temporal Scope of the Appraisal

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

### Topics Covered in the Appraisal

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

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

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

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

### Aspects of the DPD assessed and methodology

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

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

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

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

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

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

## Consultation

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

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

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

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

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

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

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

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

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

### Policies

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

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

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

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

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

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

## Appraisal of Cumulative and Synergistic Effects

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

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

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

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

## Appraisal of Transboundary Effects

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

## Mitigation

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

## Technical Limitations and Uncertainties

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

## 2.5 Stage C: Preparation of the SA Report

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

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

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



## 3 APPRAISAL OF THE ALTERNATIVES

### 3.1 Appraisal of Alternatives (SA 2009)

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

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

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

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

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

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

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

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

# 4 APPRAISAL OF THE CHANGES TO THE CORE STRATEGY

## 4.1 Introduction

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

## 4.2 Appraisal of the Vision and Objectives

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

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

## 4.3 Appraisal of Policy Changes

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

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

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

Field

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

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

## Sustainability Comments

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

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

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

## Recommendations and Mitigation Potential

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



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

## 4.4 Cumulative Effects

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

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

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

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

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

## 5 NEXT STEPS

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



Appendix A

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# Review of Plans, Programmes and Environmental Protection Objectives

# Appendix B



## Baseline Data

Sieve analysis of changes to policies



## Scoping Report Comments

## Sustainability appraisal of alternatives

Appendix F

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## Sustainability Appraisal of Revised Policies