

Ipswich Borough Council Flood Risk Sequential Test and Exception Test Statement

Introduction

Ipswich Borough Council is currently producing a review of its Core Strategy and Policies development plan document (DPD) and a Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD. These two documents will form the Council's Local Plan once adopted and will replace the following documents:

- Ipswich Local Plan (1997) saved policies
- Core Strategy and Policies DPD (2011)

This statement updates a previous sequential statement dated 31st May 2011 and an exception test statement dated 8th September 2011.

Sequential Test

In order to allocate sites the Council has undertaken a sequential test to assess the level of flood risk present on each site and to steer development to sites at a lower risk of flooding where appropriate, while taking into account necessity to develop on previously developed land in areas of central Ipswich. There are limited brownfield sites available for development in flood zone 1 and taking into account the need for the regeneration of brownfield sites and to locate development in central locations to minimise carbon emissions and the need to travel, it is necessary to locate some development in flood zones 2 and 3a.

The previous sequential test in 2011 considered sites identified in the strategic housing land availability assessment (SHLAA) dated March 2010. However, since this time the Council has drafted its Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, which was subject to public consultation between January and March 2014 (regulation 18 draft stage¹), and informed by a SHLAA update in November 2013.

The Council has drafted a proposed submission version of the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD (November 2014) (regulation 19 proposed submission stage²), alongside a proposed submission version of the Core Strategy and Policies DPD review (November 2014). Sites from these two documents without planning permission at 1st April 2014 are listed below. These sites have been divided into three categories to reflect the sequential approach to site selection in accordance with the National Planning Policy Framework (NPPF) (March 2012), which prioritises the use of brownfield land and sites away from land at risk of flooding.

The three categories are:

- Brownfield sites in flood zone 1
- Greenfield sites in flood zone 1
- Brownfield sites in flood zone 2 and 3a

Potential Development Sites (IP references)

The Council is not able to meet its total housing requirement from sites within flood zone 1 therefore sites within flood zones 2 and 3a are required for development. This is also required to ensure the regeneration of central Ipswich, and to ensure brownfield land is recycled to take account of the benefits of sustainable development.

¹ Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012

² Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012

The Council has through its SHLAA (March 2010) and SHLAA update (November 2013), identified sites which are capable of delivering residential development either wholly or as part of mixed-use development during the plan period to 2031. The SHLAA assesses the suitability, availability and achievability of sites indicating a likely delivery timescale. One of the constraints in the site analysis is whether a site is in flood zone 2 or 3a. The SHLAA and SHLAA update has informed the Council's housing trajectory, the most recent of which was published in the Council's Authority Monitoring Report 10 (December 2014) for the monitoring period 2013/14. The housing trajectory identifies a housing land supply for 15 years (2015 to 2030).

The housing trajectory identifies 899 dwellings on brownfield sites in flood zone 1 without planning permission at 1st April 2014 as listed below.

Site Ref	Site Name	IP-One	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP005	Former Tooks Bakery, Old Norwich Road	No	2017-20	2.80	101
IP006	Co-op Warehouse, Paul's Road	Yes	2020-21	0.63	28
IP009	Victoria Nurseries, Westerfield Road	No	2020-21	0.39	12
IP010a	Co-op Depot, Felixstowe Road	No	2022-25	1.95	66
IP010b	Felixstowe Road	No	2022-25	2.79	75
IP012	Peter's Ice Cream	Yes	2022-23	0.32	29
IP033	Land at Bramford Road (Stock's site)	No	2020-22	2.03	46
IP040 & IP041	Civic Centre Area / Civic Drive	Yes	2019-20	1.60	0 (net) – 32 existing dwellings
IP048	Mint Quarter	Yes	2020-22	1.33	72
IP059a	Elton Park Industrial Estate	No	2017-20	2.63	105
IP066	JJ Wilson, White Elm Street	No	2020-21	0.32	18
IP089	Waterworks Street	Yes	2021-22	0.31	23 (net) (not including 5 existing dwellings)
IP116	St Clement's Hospital Grounds (now has resolution to grant planning permission subject to Section 106 Agreement)	No	2017-22	6.59*	127*
IP131	Milton Street (formerly 488-496 Woodbridge Road)	No	2020-21	0.28	13
IP142	Land at Duke Street	Yes	2020-21	0.39	26
IP165	Eastway Business Park, Europa Way (now has planning permission)	No	2017-20	2.08	94
IP172	15-19 St Margaret's Green	Yes	2018-19	0.08	9
IP214	300 Old Foundry Road	Yes	2019-20	0.02	11
IP221	The Flying Horse PH, 4 Waterford Road	No	2019-20	0.35	12
IP245	12-12a Arcade Street	Yes	2019-20	0.06	14
IP256	Artificial Hockey Pitch, Ipswich Sports Club, Henley Road	No	2021-22	0.60	18
	Total				899

* Note this site is part brownfield and part greenfield and the remainder is shown in the table below.

The housing trajectory identifies 300 dwellings on greenfield sites in flood zone 1 without planning permission at 1st April 2014 excluding the Ipswich Garden Suburb as listed below.

Site Ref	Site Name	IP-One	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP029	Land opposite 674-734 Bramford Road	No	2018-20	2.26	71
IP032	King George V Field, Old Norwich Road	No	2020-23	3.54	99
IP061	School Site, Lavenham Road	No	2019-20	1.08	30
IP116	St Clement's Hospital Grounds (now has resolution to grant planning permission subject to Section 106 Agreement)	No	2017-22	5.26*	100*
	Total				300

* Note this site is part brownfield and part greenfield and the remainder is shown in the previous table.

A further 2,677 dwellings are identified at the Ipswich Garden Suburb (previously Northern Fringe) between 2016 and 2030, 123 projected in 2031 bringing the total in the plan period to 2031 to 2,800 dwellings. The proposed submission Core Strategy and Policies development plan document review identifies approximately 3,500 dwellings being delivered at the Ipswich Garden Suburb in total with completion beyond 2031.

Site Ref	Site Name	IP-One	Delivery	Site Size (ha)	Indicative Capacity (Homes)
	Land west of Westerfield Road and south of Railway Line	No	2016-25		800
	Broad Location North Ipswich	No	2018-31		2,000
	Broad Location North Ipswich	No	2031-		700
	Total				3,500

Sites identified in flood zones 2 and 3a without planning permission are shown below. These pass the sequential test as it is demonstrated above, there are not enough sites available and developable within the plan period to meet the housing requirement of the Borough. Sites are required to be developed in flood zones 2 and 3a to contribute towards meeting the housing needs of Ipswich. The table concurs with that shown in the Council's level 2 Strategic Flood Risk Assessment (SFRA) and the housing trajectory identifies 764 dwellings on brownfield sites in flood zones 2 and 3a without planning permission.

Site Ref	Site Name	IP-One	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP004	Sir Alf Ramsey Way / West End Road	Yes	2023-25	1.07	48
IP011b	Smart Street / Foundation Street	Yes	2023-25	0.69	50
IP015	West End Road Surface Car Park	Yes	2021-22	1.22	22
IP031	Burrell Road	Yes	2019-20	0.44	20
IP037	Island Site	Yes	2025-30	6.02	271
IP039a	Land between Gower Street & Great Whip Street	Yes	2023-25	0.48	43
IP043	Commercial Buildings and Jewish Burial Ground, Star Lane	Yes	2023-25	0.70	50
IP052	Land between Lower Orwell Street & Star Lane	Yes	2022-23	0.40	29

IP054	Land between Old Cattle Market & Star Lane	Yes	2022-23	1.72	28
IP080	240 Wherstead Road	Yes	2019-20	0.49	27
IP096	Car Park, Handford Road East	Yes	2021-22	0.22	20
IP098	Transco, south of Patteson Road	Yes	2023-25	0.57	51
IP105	Depot, Beaconsfield Road	No	2021-22	0.33	15
IP133	Land south of Felaw Street	Yes	2022-23	0.37	33
IP136	Silo, College Street	Yes	2023-25	0.16	48
IP188	Webster's Saleyard Site, Dock Street (planning permission for 3 flats subject to commencement of construction on the flood defence barrier)	Yes	2018-19	0.11	9
	Total				764

The Flood Defence Barrier, scheduled for completion in 2017, will assist in the delivery of sites in flood zones 2 and 3a, and this is recognised in the housing land supply with sites that do not currently have planning permission phased to later in the plan period. However sites are not necessarily dependent on the Flood Defence Barrier if they are in accordance with the Council's Flood Safety Framework in section 16 of the level 2 SFRA and section 8.3 of the Council's Development and Flood Risk supplementary planning document. This is noted in the level 2 SFRA, where it is demonstrated that the exception test has been applied.

Exception Test

The exception test as defined in paragraph 102 of the National Planning Policy Framework (NPPF) sets out that proposed development must provide wider sustainability benefits to the community that outweigh flood risk and will be safe for its lifetime. As noted above the level 2 SFRA demonstrates that the exception test has been applied, as development within flood zones 2 and 3a will contribute to the regeneration of central Ipswich through the use of brownfield sites.

Proposed residential development sites and the Flood Defence Barrier

The following table shows sites that are dependent on the Flood Defence Barrier (that did not have planning permission at 1st April 2010) as identified in the Level 2 SFRA (May 2011) and did not have planning permission at 1st April 2014.

Site Ref	Site Name	IP-One	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP096	Car Park, Handford Road East	Yes	2021-22	0.22	20
IP105	Depot, Beaconsfield Road	No	2021-22	0.34	15
	Total				35

The following table shows sites dependent on the Flood Defence Barrier with further on- and/or off-site works required (that did not have planning permission at 1st April 2010) as identified in the Level 2 SFRA (May 2011) and did not have planning permission at 1st April 2014.

Site Ref	Site Name	IP-One	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP004	Sir Alf Ramsey Way / West End Road	Yes	2023-25	1.07	48
IP037	Island Site	Yes	2025-30	6.02	271

IP098	Transco, south of Patteson Road	Yes	2023-25	0.57	51
IP136	Silo, College Street	Yes	2023-25	0.16	48
IP188	Webster's Saleyard Site, Dock Street (planning permission for 3 flats subject to commencement of construction on the flood defence barrier)	Yes	2018-19	0.11	9
IP132	Bridge Street, Northern Quays (west)*	Yes	2018-20	0.18	64
	Total				491

* If planning permission (10/00343) not implemented (this expired in April 2014).

Note there is a current planning permission for (IP205) Burtons Warehouse (125 dwellings) and a resolution to grant planning permission subject to a Section 106 Agreement for (IP226) Helena Road (566 dwellings). Should revised planning applications be presented they would need to be considered with a revised Flood Risk Assessment.

The following table shows sites not dependent on the Flood Defence Barrier so long as on- and/or off-site works are undertaken.

Site Ref	Site Name	IP-One	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP011b	Smart Street / Foundation Street	Yes	2023-25	0.69	50
IP015	West End Road Surface Car Park	Yes	2021-22	1.22	22
IP031	Burrell Road	Yes	2019-20	0.44	20
IP039a	Land between Gower Street & Great Whip Street	Yes	2023-25	0.48	43
IP054	Land between Old Cattle Market & Star Lane	Yes	2022-23	1.72	28
IP080	240 Wherstead Road	Yes	2019-20	0.49	27
	Total				190

Note site IP047 – Land at Commercial Road previously had a mixed-use planning permission, which expired in February 2015 and any new residential development on this site is to be considered with the table above.

The feasibility of off-site works required to create safe access routes, typically by providing new roads or raising existing roads, is generally unknown. Land raising has been used previously at several sites.

For site IP098 (and others in the Cliff Road / Holywells Road area not currently identified for housing) strategic land raising, including raising routes to higher ground, might enable development and alleviate severe local highway flooding.

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 4th March 2015