

Ipswich Borough Council Local Plan

**Examination of Core Strategy and Policies Development Plan Document
Review and Site Allocations and Policies (Incorporating IP-One Area Action
Plan) Development Plan Document**

Stage 2 Matters and Questions - Response to Matter 5 Ipswich Garden Suburb

June 2016



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Matter 5 – Ipswich Garden Suburb Policy CS10 and Core Strategy Table 8B

5.1 Having particular regard to the following are the policies and proposals for Ipswich Garden Suburb soundly-based?

- **Traffic and transport**
- **Other infrastructure and services**
- **Air Quality**
- **Fresh and Waste Water and Flooding**
- **Landscape and nature conservation**
- **Realistic delivery during the plan period**
- **The flexibility of the policy requirements**

If you contend that the policies and proposals are not sound, how should they be modified?

Background

1. The Ipswich Garden Suburb (IGS) is a plan-led sustainable urban extension, which seeks to secure high quality design and a high level of amenity for existing and future residents in Ipswich in accordance with the core planning principles set out in the National Planning Policy Framework (NPPF). The proposal significantly contributes to meeting the housing need identified for Ipswich Borough and its location supports the use of non-car transport, given its close proximity to Ipswich town centre, Ipswich and Westerfield railway stations, local facilities and numerous employment destinations within Ipswich Borough.
2. The Council approved the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance ('the SPD') in September 2014. This was the result of two years' work involving the public, stakeholders, representatives from public sector agencies, landowners and Borough and County councillors through a process which included a community steering panel, a stakeholder workshop and numerous public exhibitions. The SPD provides comprehensive, supplementary planning and design guidance for the master planning of the Garden Suburb, to support Local Plan policy CS10. The garden suburb approach set out in the SPD was ahead of its time and complies with paragraph 52 of the NPPF. The SPD cannot be fully adopted until the Core Strategy and Policies Development Plan Document Review ('the CSR') has been adopted.
3. Previously, part of the IGS site now proposed for allocation through policy CS10 in the vicinity of Henley Road and Westerfield Road was identified as a potential development area through the Suffolk County Structure Plan 2001 and allocated for development for 1,500 homes through the Ipswich Borough First Deposit Draft Local Plan 2001. The First Deposit Draft Local Plan was superseded before it reached adoption by the Ipswich Local Development Framework.

Traffic and transport

4. The NPPF at paragraph 30 identifies the need in preparing Local Plans to support a pattern of development, which facilitates the use of sustainable modes of transport. The IGS is in a highly sustainable location both in relation to its location in Ipswich (approximately 1.2 miles from Ipswich town centre) and adjacent to the largest urban area in Suffolk. There is no more sustainable location in which to accommodate growth related to the needs of Ipswich.

5. The transport modelling which supports the Local Plan (2010¹ and updated 2016²) indicates that, whilst there will be increased waiting times at some junctions, no major new off-site road infrastructure such as a northern bypass is needed to support development at IGS. The Highway Authority's letter to the Council dated 24th May 2016³ states that:

'The modelling work has shown the average increase in travel time per vehicle trip across the network would be 90 seconds in the AM peak and 120 seconds in the PM peak. This increase in average travel time is not considered severe given existing day to day fluctuations.'
6. The letter further identifies that the modelling was undertaken on a very conservative basis in that it did not include mitigation measures which will be required in association with developments as they progress through the planning process. Thus the Local Plan complies with the NPPF paragraph 32.
7. Infrastructure needs for the IGS, which include infrastructure related to traffic and transport, are identified through policy CS10 and Table 8B of the CSR. Policy CS10 also requires the preparation of an Infrastructure Delivery Plan to guide planning applications and this will set out in more detail how the proposed development and infrastructure will be funded and delivered.
8. Suffolk County Council as the highway authority has accepted the principle of up to 5,000 homes being built at IGS without the need for any new off-site road building subject to an appropriate sustainable transport strategy. This approach sits within the context of the highway authority's general strategy entitled 'Ipswich: Fit for the 21st Century' and now known as Travel Ipswich⁴. The strategy aims to prioritise sustainable modes / achieve a modal shift and secure better management of the existing network rather than building additional road space.
9. The Local Plan policies are supported by more detailed guidance set out in the SPD. The Transport Strategy in chapter 6 of the SPD sets out the measures by which sustainable modes of transport will be prioritised for IGS. This, along with the master plan contained within the SPD, illustrates how a good range of local facilities will be provided within walkable neighbourhoods, together with excellent cycle and walking connections within the site to maximise accessibility.
10. The proposed development will inevitably generate vehicular traffic, but the homes are needed and building anywhere in or around or outside Ipswich will result in some traffic increases on routes into and across the town centre. Given the scale of the IGS and the comprehensive way in which it is intended to be planned through policy CS10 and the SPD, the development provides the optimum opportunity to reduce the increase in traffic through its location, the site-wide measures outlined in the SPD and improvements to sustainable modes of transport in the area such as bus and train services. Some of these sustainable travel measures will be available also to existing residents, thus improving opportunities generally to make sustainable transport choices.

¹ Aecom, 2010, *Ipswich Transport Model Assessment*, CDL reference ICD48

² WSP/Parsons Brinckerhoff, May 2016, *Ipswich Core Strategy – Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report*, CDL reference PSCD18

³ Suffolk County Council, May 2016, *Letter to Ipswich Borough Council*, CDL reference PSCD18a

⁴ Aecom & SCC, *Ipswich: fit for the 21st Century Major Scheme* (now known as Travel Ipswich) (Online only), CDL reference ICD46

11. A detailed transport assessment is required to be submitted with all future planning applications for the IGS. This will provide the more detailed assessment of the traffic resulting from the developments and from this a detailed scheme of mitigation can be determined incorporating the specific improvement / traffic calming needed to surrounding roads and junctions, cycle / pedestrian connections and increased capacity to public transport. Transport effects will be considered within Environmental Impact Assessments to be submitted with planning applications.
12. Regarding a possible future northern route, the Council's position is set out through policy CS20 / paragraph 8.213. This is that further investigation of the need for a northern route is supported. However, until this detailed work has been carried out, the potential benefits and disbenefits of such a route cannot be identified. As detailed in Suffolk County Council's letter dated 24th May 2016 (see above), a study into the need for additional road capacity to the north of Ipswich is currently underway.

Other infrastructure and services

13. Ipswich Borough Council is satisfied that, with regard to the Community Infrastructure Levy Regulations tests⁵, all IGS infrastructure identified through CS10 and Table 8B is necessary to make the development acceptable in planning terms for various reasons related to ensuring sustainable development, mitigating transport impacts, meeting Habitat Regulation requirements and ensuring future residents are well served by the necessary educational and social facilities essential to any successful residential development of this nature and scale. The Council is also satisfied that the IGS infrastructure is directly related to the development, and the test of this being fairly and reasonably related in scale and kind to the development will guide the Council in seeking proportionate contributions for those items where proportioning costs is practicable (e.g. secondary school provision).
14. Policy CS10 requires the preparation of an Infrastructure Delivery Plan (IDP) to guide planning applications and this will set out in more detail how the proposed development and infrastructure will be funded and delivered. Table 8B of the CSR provides a list of infrastructure and service requirements that the Council believes necessary to mitigate the impact of the wider development and secure the delivery of a sustainable urban extension to Ipswich. The triggers in Table 8B result from balancing the need for the timely delivery of certain items of infrastructure with ensuring that the development as a whole can be delivered viably. The Council has procured independent viability advice to help inform the delivery and viability of the identified infrastructure. The appointed consultant, Peter Brett Associates (PBA), has produced a development appraisal that is in accordance with the NPPF and the latest available guidance on viability.
15. A caveat is noted in the footnote to Table 8B advising that the triggers are as stated unless otherwise agreed with the Council through Infrastructure Delivery Plans. Triggers are considered appropriate to give a framework for ensuring necessary infrastructure to support the development is provided. More detailed assessments submitted with the planning applications may require infrastructure to be delivered at different points and policy allows for this where it is agreed with the Local Planning Authority.

⁵ DCGL, *Community Infrastructure Levy Regulations*, 2010 (as amended) CDL reference PSCD27 – Section 122 sets out the three tests: (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.

16. The Council and the main IGS promoters have been engaged in discussions concerned with producing an appropriate IDP. The Council has commissioned consultants to produce a draft IDP which results from 3 stages of work. The first stage looked at reviewing the costs of infrastructure. The second stage undertook a finer grain analysis of the viability. These two stages of work have recently been completed and stage 3 work has now commenced. Stage 3 work seeks to identify the delivery mechanism which would best secure the delivery and funding of the infrastructure at the right times and would inform the final IDP. The IDP work to date has involved significant input from developers and discussions with developers have commenced on the preferred mechanism for the stage 3 work. A preferred mechanism has been identified by consultants but discussions are ongoing to ascertain whether this would be most effective in bringing forward realistic delivery of the planned development.
17. The country park is a measure required as a result of the Habitats Regulations Assessment (HRA)⁶ to mitigate the potential impacts of the Borough's growth on the Orwell Estuary Special Protection Area. The HRA for the CSR indicates that the country park should be provided by the end of the plan period (2031). The IDP will also address its delivery.
18. Policy CS10 and Table 8B of the CSR require the provision of a 1,200 place secondary school including sixth form facility at the IGS. The policies map shows the land in the eastern neighbourhood allocated for the school, where playing fields will contribute to an area of green separation between IGS and Westerfield Village. The Local Plan also requires the provision of a primary school in each neighbourhood with broad locations indicated on the policies map. The need for this education provision has been evidenced by Suffolk County Council, which first identified the need for a new secondary school as part of the SPD Issues and Options consultation. This position has been upheld throughout the SPD and Local Plan process and more recently was reiterated in response to the CBRE planning application where the future capacity of existing secondary schools was considered in the context of the cumulative impact from the Ipswich Garden Suburb developments. The consultation response confirmed that a new secondary school would be needed by 2021 to accommodate this growth.
19. Following consultation with the local agents for the NHS, a serviced site with contributions is seen as the optimal solution for the delivery of a health centre, as set out in Table 8B. NHS Suffolk has identified a deficit in primary health care capacity in the catchment area to IGS. It has therefore advised that in order to ensure new primary health care capacity is delivered for IGS residents, a site of sufficient size to meet the related health care needs is provided, along with developer contributions in order to bring forward a health centre at an appropriate point by an NHS body. It has been ascertained that based on the population arising from IGS, a site of approximately 0.2 ha is required, which would include parking, drainage and landscaping.
20. Infrastructure impacts of the proposed development resulting from the allocation will also be subject to Environmental Impact Assessments and supporting planning application documents, which will have to be submitted with individual planning applications.

⁶ The Landscape Partnership, 2014, *Habitats Regulations Assessment for Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review*, CDL reference SUCD11

Air Quality

21. The transport modelling referred to above (Traffic and Transport) indicates that there is likely to be an increase in traffic volumes, journey time and travel distance by 2031 as well as an increase in the number of junctions at which demand exceeds capacity at peak times, as a result of all the planned development including that at the IGS. The Highway Authority concludes in its letter of 24th May that this outcome is ‘... to be expected given the scale of background and proposed local plan growth and is not dissimilar to the position in other towns and cities across the country given the need for additional housing and jobs.’ It considers that the increase in average travel time is not severe.
22. However, the modelling is done on a conservative basis and does not include the detailed mitigation measures which will be required in conjunction with the development. This is significant in relation to the issue of air quality.
23. Potential traffic and air quality effects arising from the IGS allocation were identified through the Sustainability Appraisal, which resulted in amendments to the plans as outlined in the Annex to the Proposed Submission Sustainability Reports (Dec 2014)⁷.
24. Further Air Quality information was requested by the Inspector during the Ipswich Local Plan Stage 1 hearings held in March 2016. Further work has been carried out to model air quality and the results set out in a report⁸. This is complemented by a letter from the consultants, attached at Appendix 1, which provides further explanation of the results. It indicates that, for the locations on the highway network where there is a medium to high risk of non-compliance with current government standards for air quality in relation to future development under the Ipswich Local Plan, it is considered that measures are capable of being put in place which would mitigate the effects likely to arise from proposed development. In the letter the consultants conclude that:

‘From our analysis to date, we are confident that the air quality effects of the IGS can be appropriately mitigated having regard to its limited impact on the principally relevant junctions, the scope for improvement at the majority of those junctions and the use of a package of travel plan initiatives in association with individual developments. Air quality does not therefore raise any in principle concerns.’
25. The CSR and SPD contain requirements for sustainable transport infrastructure. The Council is also currently producing a Cycling Strategy Supplementary Planning Document⁹, which is anticipated to be adopted in July 2016, and a Low Emissions Strategy Supplementary Planning Document¹⁰.
26. Detailed assessments of air quality and necessary monitoring and mitigation will be determined at the planning application stage in the Environmental Impact Assessment and supporting planning application documents. These will be based on traffic modelling submitted with the planning applications.

⁷ IBC, December 2014, Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations, CDL reference LPCD36

⁸ WSP/Parsons Brinckerhoff, May 2016, *Air Quality Assessment*, CDL reference PSCD19

⁹ IBC, 2015, *Draft Cycling Strategy Supplementary Planning Document*, CDL reference ICD30

¹⁰ IBC Supplementary Planning Document web page, <https://www.ipswich.gov.uk/content/current-and-proposed-supplementary-planning-documents>

Fresh and Waste Water and Flooding

27. Flooding is addressed through the Strategic Flood Risk Assessment¹¹, policy DM4 of the CSR and the Development and Flood Risk SPD¹².
28. For the IGS, policies are supported by more detailed guidance in the SPD. This sets out more on the Sustainable Drainage Systems (SuDS) strategy and identifies the preliminary work which has been undertaken and concludes that a strategy can be implemented which is effective. The preliminary SuDS strategy takes account of increases in expected peak rainfall intensity in accordance with national guidance. Details of the adoption and supervision of SuDS will need to be submitted and approved as part of the planning application before construction can commence. The preliminary SuDS strategy will also move from being a draft document to being adopted as part of the SPD. Additional information to be provided in the SPD includes topography and hydrology information for the site.
29. Drainage effects will also be subject to Environmental Impact Assessment / more detailed assessment work set out in supporting planning application documents, to be submitted with planning applications.
30. Discussions are ongoing between Anglian Water and the developers on the matter of water and sewerage. Anglian Water has advised that it will use its Drainage Area Plan to inform their responses to the detailed schemes for IGS and ensure the best available drainage solution is adopted to serve the development. Their current position on the IGS is set out in an email attached at Appendix 2.

Landscape and Nature Conservation

31. The IGS allocation through policy CS10 and as shown on the policies map does not include land with specific nature conservation or landscape designations protected through the Local Plan, such as County Wildlife Sites. That is not to say that it is without interest, for example it does contain trees protected by tree preservation orders. This is reflected in the 'Character' theme for SPD vision, which clearly sets out the expectation that the Garden Suburb will be landscape dominated, including new planting, open spaces and the retention of the best of existing hedgerows and trees for nature. The Landscape and Open Space Strategy within the SPD refers to existing trees, hedgerows and woodland forming an important landscape feature and being used to inform the layout and landscape strategy. The design principles include provision for retaining hedgerows and trees and the master plan is set around the existing grid of hedgerows and significant trees. Further tree / hedgerow work is required to be submitted with future planning applications, to inform layout and biodiversity matters. Full landscape effects will also be considered within Environmental Impact Assessments.
32. The SPD has established firm baselines for the creation of a Garden Suburb. These address rural edge issues as well as the place-making qualities expected of a modern residential development. In particular, there has been an emphasis from the outset on the conservation of existing landscape assets – primarily hedgerows and field trees. The SPD goes to some lengths to identify and ensure the protection of these features. In addition, a network of open space has been established which helps protect the setting of Fonnereau Way, and retains the most attractive northern edge of the site as

¹¹ IBC, 2011, *Strategic Flood Risk Assessment*, CDL reference ICD33

¹² IBC, June 2016, *Development and Flood Risk SPD*, CDL reference PSCD29

a Country Park. There are several additional open spaces which will add to the garden suburb setting, and provision for allotments.

33. The Wildlife Audit update¹³ included phase 1 habitat surveys of the allocated sites at IGS, and looked at existing species records and potential. The biodiversity interest at the IGS is in the trees, hedgerows and ponds and this is reflected in the SPD's strategies for landscape and biodiversity described above. Policies CS4, DM10 and DM31 of the CSR protect biodiversity, trees and hedgerows.
34. A Country Park is proposed at the northern edge of the IGS to meet HRA mitigation requirements, alongside other areas of public open space which meet open space standards set out in the local plan. Policy CS10 specifies that it should extend to at least 24.5ha and Table 8B identifies it as strategic infrastructure and identifies the trigger for its delivery (see also 'Other Infrastructure' above).
35. Ecology and Biodiversity assessments are required to be submitted with future planning applications / Environmental Impact Assessments and these will identify necessary ecology / biodiversity measures needed to maintain and enhance the value of the site for wildlife. More detailed hedgerow and tree surveys are also required as part of the future planning applications and these will ascertain the arboricultural quality and extent of trees / hedgerows to be retained in the IGS area.
36. The Local Plan also sets out a positive approach to good design through policies CS2, DM3 and DM5. In relation to IGS, the SPD provides more detailed guidance. Garden sizes accord with adopted and emerging planning policy and the density is set at a level which balances the desire to make the most efficient use of this greenfield site and still enable an appropriate garden suburb character to be achieved.
37. Minimum distances between certain house elevations are advised through the SPD to ensure sufficient spacing between properties and levels of residential amenity (paragraph 5.46). This is in part to make the most of this greenfield site in terms of meeting the housing needs of the Borough, although this is at the lower end of the housing densities currently advised in the Council's planning policy (DM30). Despite being denser than adjoining areas of housing, there are substantial areas of strategic green space which are required through policy CS10 and this, together with the very clear view on the garden city principles included in the SPD, is considered to provide sufficient basis and does not compromise on the garden suburb character which the plan and SPD seek to achieve. The density proposed (35 dph net) is compliant with policy DM30.
38. High level assessment of the environmental impacts of the IGS proposals has been undertaken and supports the principle that the site can be developed sustainably. More detailed environmental assessments will be submitted with the planning applications to identify any specific mitigation which may be required.

Realistic delivery during the plan period

39. The Ipswich Local Plan seeks to deliver a wide choice of high quality homes within Ipswich Borough. The IGS is focused primarily on family homes with gardens to balance the large number of apartments being delivered at the Ipswich Waterfront and within the central area of the town.

¹³ Suffolk Wildlife Trust, 2013, *Ipswich Wildlife Audit*, CDL reference ICD24

40. The Council's Authority Monitoring Report 11¹⁴, identifies the delivery of 2,800 dwellings between 2017/18 and 2031. This has subsequently been amended to 2,700 dwellings through amendments proposed to policy CS7 (Matter 3).
41. The Council currently has two planning applications for different sites within the IGS. The combined total of residential units proposed by the applications is 1,915 and represents 70% of the total number of units envisaged in the plan period. The Council's projections for the IGS housing trajectory assumes a total of 379 units in the first five years of the plan period. This increases to a peak of around 300 units per year for the following 5 years and between 150-200 per year in the final five years of the plan period.
42. Statements from the main promoters – CBRE, Crest and Mersea Homes, in response to Stage 1, Matter 2, set out the projected housing delivery which is in line with the Council's assumptions and offers support to the realistic prospect of this amount of housing being delivered, with development commencing next year and occupations commencing the year after (2018). There are discussions around other sites within IGS coming forward in the future and the IDP work has been informed by these discussions. The ongoing IDP work has taken a more detailed look at the likely housing trajectory alongside infrastructure requirements and what this means for viability.
43. Subject to an IDP being in place and all other matters resolved, then there is a realistic prospect of development commencing across the two sites in 2017 and occupations of units starting 2017/2018.
44. In terms of an appropriate IDP being in place, which can be used to inform and guide any overarching agreements for individual planning agreements, this work is ongoing. Significant progress has been made by the Council and promoters in understanding the complexities of delivering the infrastructure and ensuring it is delivered at the right times in the development, whilst taking into account the different land ownerships and commercial interests of the individual promoters. A mechanism for achieving this has been identified but further discussions are ongoing with the promoters to ensure that the mechanism is appropriate and deliverable.

The flexibility of the policy requirements

45. Table 8B within the CSR sets out the infrastructure considered necessary to support the development. Policy CS10 amplifies some of these items which result in particular land uses being provided within the IGS development (i.e. primary schools, country park etc.) and fixes this within policy. Viability work undertaken to date concludes that the IGS development can viably provide this infrastructure at the appropriate times in development.
46. Policy allows for an appropriate level of flexibility for proposals to evolve as planning applications and more detailed consideration of sites and proposals are undertaken. In particular viability is subject to more detailed consideration of proposal costs and values at the point that planning applications are submitted. As identified in the commentary associated with Table 8B, flexibility on the timings could be allowed where it is evidenced through further assessment work, but what is not identified as flexible is the list of infrastructure. Flexibility with regards to the timings/phasing of infrastructure delivery would comply with NPPF objectives in ensuring a degree of

¹⁴ IBC, *Authority Monitoring Report 11*, CDL reference ICD03a

flexibility with regards to development requirements, but the list of infrastructure would be fixed by policy.

47. In addition, supporting policy CS12 allows for the affordable housing level to be adjusted where justified in specified instances. Policy CS10 does not specify the detailed aspects of the delivery of the development or infrastructure, as this is recognised as being an evolving process as more detailed assessment work through the planning applications is submitted and considered.

5.2 Does the Sustainability Appraisal adequately assess the likely effects of the Ipswich Garden Suburb and test it against reasonable alternatives? If you contend that the Appraisal is inadequate what further work should be undertaken?

48. Alternatives to the Ipswich Garden Suburb were first considered through the Site Allocations Issues and Options¹⁵ whereby six areas for major greenfield development were put forward. Three of these areas (B, C and D) were then taken forward as preferred options and were assessed through the Preferred Options Sustainability Appraisal¹⁶. The discussion of alternatives under Policy Area 11: Greenfield Land explains that areas between Henley Road and Tuddenham Road would be suitable for residential led development. The site east of Henley Road and south of the railway line was allocated for 1,000 dwellings in the adopted Core Strategy¹⁷. The area north of the railway line and the area west of Tuddenham Road (which now form the remainder of the garden suburb) were identified as a broad area for development post 2021. As the CSR now seeks to formally allocate these remaining areas it has been necessary for the Sustainability Appraisal (SA) to be revisited. However, as part of the Ipswich Garden Suburb is already allocated, reasonable alternatives are limited.
49. The potential effects of allocating the whole garden suburb were assessed through the Core Strategy Review SA Interim Report¹⁸. Table 3.1 of that report compares the effects of adopted policy CS10 and the draft revised policy. This identified positive effects in relation to the provision of community and education facilities, through encouraging sustainable modes of transport and increasing the attractiveness of the area for inward investment. It identified negative effects in relation to air pollution due to increased traffic, loss of agricultural land, potential loss of habitats and waste generation. The SA concluded that mitigation measures relating to open space and parks, creation and enhancement of habitats where appropriate, and improved pedestrian and cycling infrastructure would have the potential to reduce any negative effects.
50. As a result of comments received during consultation on the Draft Core Strategy Review and accompanying SA Interim Report, the SA was revisited to ensure that the SA's conclusions were clear. In particular, the conclusions in respect of traffic and air quality were elaborated upon. The assessment of CS10 contained in Appendix D of the Proposed Submission Core Strategy SA Report¹⁹ clearly identifies negative effects in relation to a number of SA objectives including air quality and traffic.

¹⁵ IBC, 2006, *Site Allocations and Policies Issues and Options*, CDL reference LPCD03

¹⁶ IBC, 2007, *Sustainability Appraisal Preferred Options*, CDL reference LPCD09

¹⁷ IBC, 2011, *Core Strategy and Policies Development Plan Document*, CDL reference LPCD11

¹⁸ Hyder, 2013, *Focused Review of Draft Core Strategy and Policies DPD Interim Sustainability Appraisal Report*, CDL reference LPCD19

¹⁹ Arcadis, Dec 2015, *Core Strategy and Policies DPD Review Sustainability Appraisal Report*, CDL reference SUCD09

51. It must be acknowledged that the SA is assessing each policy individually and does not take into account whether other policies in the Plan, or the Ipswich Garden Suburb SPD, might provide for the required mitigation. The Council has paid attention to the requirements of the Planning Practice Guidance in that 'A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the Local Plan being assessed.' In this respect the SA has been clear in highlighting where more detailed assessments would be required at the planning application stage.
52. Further explanation was provided in relation to alternatives in the Core Strategy Review SA Report. This concluded that an alternative relating to a lower number of houses at the garden suburb along with a higher number of dwellings to be delivered outside of the Borough would not be reasonable. Furthermore, the site is sustainable in locational terms, it is suitable and deliverable and already allocated/identified for development.
53. The Traffic Assessment²⁰ and Air Quality Assessment²¹ were published in May 2016 and support the conclusions of the SA in respect of these issues. Whilst increased congestion is predicted, the report concludes that effects are likely to be capable of mitigation. This is further supported by the letter received from Suffolk County Council on 24th May 2016²² whereby they consider that the plan is not unsound in relation to transport considerations, and the letter received from WSP (Appendix 1) confirming that, for the locations on the highway network where there is a medium to high risk of non-compliance with current standards for air quality as included in the Government's Air Quality Strategy in relation to future development under the Ipswich Local Plan, it is considered that measures are capable of being put in place which would mitigate the effects likely to arise from proposed development.

Modifications

54. Pre-Submission Main Modifications were proposed by the Council to policy CS10 to ensure a comprehensive approach to development in accordance with the SPD.
55. Subject to these modifications, the Council considers these policies are soundly based.

²⁰ WSP/Parsons Brinckerhoff, May 2016, *Ipswich Core Strategy Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report*, CDL reference PSCD18

²¹ WSP/Parsons Brinckerhoff, May 2016, *Air Quality Assessment*, CDL reference PSCD19

²² Suffolk County Council, May 2016, *Letter from Suffolk County Council to Ipswich Borough Council dated 24th May 2016*, CDL reference PSCD18a

Appendix 1 Transport and Air Quality Letter from WSP Parsons Brinckerhoff

Please see separate document. Please note that there are separate maps to accompany the letter.

Appendix 2 Anglian Water Position Statement

Please see separate document

Ipswich Local Plan Examination – Matter 5 Ipswich Garden Suburb

Anglian Water Services Position Statement on growth

in the Northern Fringe Garden Suburb Ipswich

June 2016

This statement sets out the view of Anglian Water Services on issues of water supply and sewerage and sewage treatment capacity and their impact on proposals for growth on the Northern Fringe of Ipswich, known as the Garden Suburb set out in the Ipswich Local Plan. This guidance is based on current policies and information and may be subject to change in the future.

Anglian Water (AW) has a duty to provide the necessary infrastructure to facilitate growth and avoid detriment to flood risk or the environment. We are currently developing a long term strategy for managing growth in the Ipswich catchment, which is likely to include surface water management, extensions of our sewer infrastructure as well as process extensions to Cliff Quay Water Recycling Centre (WRC). We will work with Flood Risk Management Authorities to identify opportunities to work in partnership to reduce flood risk in the catchment. This plan will include identifying growth triggers to monitor to ensure timing of investment is optimal. We are keen to facilitate sustainable growth.

Water Resources and Supply

The Haven Gateway WCS (2009) advised: *'Water supply - all three of the water supply companies were confident that they had sufficient resources to supply the demands of the region over the forthcoming period and had plans in place to be able to realise these resources. There was a general assumption that the demand on water would reduce per capita due to metering, reduction in leakage and householder efficiencies and additional capacities would be addressed within their current improvement plans'*. In respect of AW and resource for Ipswich Garden Suburb, the above remains the case today; we forecast no deficits under critical period (CP) conditions until at least 2039/40 and a surplus under dry year annual average (DYAA) conditions until 2029/30.

With regard to water network, upgrades to the pumps at Bramford and on site water mains will be required. We have been liaising with the developer(s) via our pre planning service and the necessary upgrades will be provided through the provisions set out in the Water Industry Act 1991.

Wastewater Treatment

The Haven Gateway Water Cycle Study (WCS) completed in 2009 indicated that employment and residential development would exceed the environmental consent in 2014/15 at the serving WRC at Cliff Quay. The underperformance of a Sludge Treatment Centre (STC) that impacts heavily on the WRC was the main limiting factor to the WRC and therefore work was undertaken and completed in May 2014 to re-build and extend the STC, this has resulted in sufficient capacity to accommodate proposed growth that is served by Cliff Quay WRC.

Further investment in Asset Management Period 7 (that is 2020-2025) will be considered to further increase capacity if necessary in line with the timing of the planned growth .

Sewerage Network

The impact on our sewerage networks will be increased and improvement works will be required to facilitate the accommodation of the garden suburb allocation. We have been liaising with the developer(s) via our pre planning service and a number of options to provide a feasible solution have been identified depending on the timing and phasing of the development that includes upsizing sewers and off line storage. The upgrades will be provided through the provisions set out in the Water Industry Act 1991.

A Drainage Area Plan model for Ipswich has been completed in April 2015 by Anglian Water that will inform the final solution.