

# **IPSWICH LOCAL PLAN 2018 – 2036 SUSTAINABILITY APPRAISAL ADDENDUM**

Strategic Environmental Assessment and Sustainability  
Appraisal

Spatial Strategy Assessment

OCTOBER 2020



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## VERSION CONTROL

Version	Date	Author	Checker	Approver	Changes
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2	29.09.20	JE	ST	JH	Second, following client comments.
3	02.10.20	JE	ST	JH	Final

This report dated 02 October 2020 has been prepared for Ipswich Borough Council (the “Client”) in accordance with the terms and conditions of appointment dated 10 September 2020 (the “Appointment”) between the Client and **Arcadis Consulting (UK) Limited** (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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# 1 Introduction

## 1.1 Purpose of this Addendum

This document is an addendum to, and a continuation of, the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (hereafter referred to as 'SA') of the Ipswich Local Plan Review (ILPR) Final Draft (the Plan).

This Addendum has been prepared by Arcadis Consulting (UK) Limited (Arcadis) on behalf of Ipswich Borough Council (the Council) in September 2020. This Addendum is not a standalone document and should be read in conjunction with the SA/SEA documents accessible on the Council's website:

<https://www.ipswich.gov.uk/content/ipswich-local-plan-review-final-draft-consultation>.

The Council submitted the Plan to the Independent Inspector in June 2020. The Council received the first Inspector's letter in response to the Plan in August 2020, which raised several queries related to SA/SEA.

With regards to spatial options, the Inspector's letter raised the following query:

*7. We note the Council's response to the representation from Bloor Homes on the Sustainability Appraisal (SA), that whilst some of the sites proposed within the ILPR are not in complete alignment with the Spatial Option 1, the spatial strategy in the ILPR follows Option 1 closely. However, the spatial strategy set out in Policy CS2 of the Core Strategy is based on a combination of regeneration in the town centre, Waterfront and Portman Quarters, and sustainable urban extensions (SUEs) at Ipswich Garden Village and Humber Doucy Lane, with more than 50% of the allocated housing proposed at the SUEs, whereas Spatial Option 1 in the SA is based on higher density urban regeneration. Therefore, does the SA provide the necessary justification for the spatial strategy proposed in the ILPR? If not, is further work required, for example, a separate appraisal of the proposed spatial strategy? If so, this could be done as an addendum to the SA."*

In line with the above, Section 2 of this Addendum presents the SA appraisal results for the spatial strategy set out in Policy CS2. Section 3 of this Addendum clarifies the Council's justification for this spatial strategy proposed in the Plan, in light of the reasonable alternative spatial strategies dealt with in the earlier iteration of the SA.

Section 3.2 of the Final Draft SA Report<sup>1</sup> presents the SA methodology, including how potential effects are predicted and evaluated. This methodology has been applied to the appraisal of the spatial option presented in this Addendum.

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<sup>1</sup> Available on the Council's website at:

[https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich\\_lp\\_sustainability\\_appraisal\\_report\\_inc\\_no\\_n-technical\\_summary.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_lp_sustainability_appraisal_report_inc_no_n-technical_summary.pdf)

## 2 Appraisal of the Spatial Option

### 2.1 The Spatial Strategy

A vital element of sustainable development is meeting the need for new housing development in locations where people can easily access the jobs, goods and services they want and need, by the most sustainable modes of travel. This benefits communities by enabling facilities to be accessed by as many people as possible, reducing the need to travel by vehicular transport, and providing opportunities for people to meet. It benefits the environment and health by reducing transport emissions, and the economy by reducing congestion.

Policy CS2: The Location and Nature of Development in the Plan, presented in full below, sets out the Council's proposed spatial strategy for ensuring sustainable development in the Borough that satisfies the objectively identified development needs. This spatial strategy has been appraised through the SA, the results of which are presented in Section 2.2.

The spatial strategy presented in Policy CS2 is as follows:

#### **Policy CS2: The Location and Nature of Development**

The regeneration and sustainable growth of Ipswich will be achieved through:

- a. Focusing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter (formerly Ipswich Village), and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development;
- b. Allocating sites for future development at the northern end of Humber Doucy Lane for housing and associated infrastructure, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4);
- c. Working with neighbouring authorities to address housing need and delivery within the Ipswich housing market area;
- d. Focusing major new retail development into the Central Shopping Area with smaller sites identified in district centres;
- e. Focusing new office, hotel, cultural and leisure development into Ipswich town centre;
- f. Directing other employment uses (B1 (except office), B2 and B8) to employment areas distributed in the outer parts of the Borough, and there will be a town centre first approach to the location of offices;
- g. Dispersing open space based (non-commercial) leisure uses throughout the town with preferred linkage to ecological networks and/or green and blue corridors, and protecting the countryside from inappropriate development; and
- h. Development demonstrating principles of high quality architecture and urban design and which enhances the public realm, ensures the security and safety of residents and is resilient to climate change.

A sustainable urban extension to north Ipswich will be delivered subject to the provision of suitable infrastructure (see policy CS10 – Ipswich Garden Suburb).

Major developments within the town centre, Portman Quarter, Waterfront and district centres should incorporate a mix of uses to help achieve integrated, vibrant and sustainable communities. Major developments (for the purposes of this policy) are defined as commercial developments of 1,000 sq. m or more or residential developments of 10 dwellings or more. Exceptions may be made for large offices or education buildings for a known end user, or for residential use where this would itself diversify the land use mix provided by surrounding buildings and complies with other policies of the plan.

In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise heritage assets and the historic character of Ipswich.

## 2.2 Spatial Strategy Appraisal Results

The full appraisal methodology and rationale is presented in the Final Draft SA Report<sup>2</sup>. This includes the baseline data for the Borough and key sustainability issues, the SA Framework of objectives and decision aiding questions, and the relevant plans, policies and objectives that have informed the appraisals. It also sets out all relevant consultation responses that have been received and how these have informed the appraisal process.

The key for presenting the overall predicted sustainability effect is presented in Table 2.1.

Table 2.1: Predicted Sustainability Effects key

Major negative	Minor negative	Neutral	Positive/negative	Uncertain	Minor positive	Major positive
--	-	O	+/-	?	+	++

Effects have also been described in terms of their duration as well as the level of uncertainty involved in the assessment as per Table 2.2.

Table 2.2: Duration and uncertainty of predicted effects

Nature of effect	Symbology in assessment table
Duration: Short-, Medium-, Long-term	ST, MT, LT
Uncertainty: Low, Medium, High	L, M, H

Table 2.3: SA predicted effects for the preferred spatial strategy (Policy CS2)

SA Objective	Effect	Commentary
1 - To reduce poverty and social exclusion	++ LT M	<p>The proposed spatial strategy in CS2 seeks to focus as much new residential development as practicable in central areas of Ipswich. The density of residential development will be higher in central areas than other parts of the Borough to make the most efficient use of land where feasible. Outside the central areas of the Borough, the proposed spatial strategy seeks to allocate land at the Ipswich Garden Suburb (CS10), northern end of Humber Doucy Lane (ISPA4) and in other areas where development would be within walking distance of district centres. This also allows for larger properties to be provided at lower densities, a key area to be addressed through the plan to meet the housing needs identified in the Strategic Housing Market Assessment. It is expected that this would help to reduce the risk of social exclusion for new residents, as they would live within or within walking distance of an existing community, with good access to community facilities and other services and amenities.</p> <p>Wards in the centre of Ipswich tend to be some of the more deprived locations in the Borough. Directing new development and investment towards these areas could help to regenerate these locations and help to tackle local rates of deprivation, through creating a sense of community pride as well as a more diverse community mix. Beyond the central areas, residential developments will include new infrastructure or contribute towards improving existing infrastructure which will benefit new and existing residents.</p> <p>Active and public transport options are generally prevalent in the central areas of Ipswich. Situating new residential development here could reduce the need for people to travel by car and therefore facilitate more passive and direct community</p>

<sup>2</sup> Available on the Council's website at:

[https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich\\_lp\\_sustainability\\_appraisal\\_report\\_inc\\_non-technical\\_summary.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_lp_sustainability_appraisal_report_inc_non-technical_summary.pdf)

SA Objective	Effect	Commentary
		<p>interactions. Where development takes place outside central areas, residents will have access to nearby amenities and facilities within walking and cycling distance, and, have access to bus services to reach the central areas of Ipswich.</p> <p>The proposed spatial strategy also seeks to ensure that major developments in the centre of Ipswich should incorporate a mix of uses to help achieve integrated, vibrant and sustainable communities. The majority of new employment development would also be predominantly situated in central areas in proximity to similar and existing land-uses. This would make a meaningful contribution towards ensuring that new residents at these major developments are living within an integrated and cohesive community.</p> <p>Whilst the majority of new employment and commercial development would take place in central areas, there is also a proposal to direct other employment uses (B1 (except office), B2 and B8) to areas distributed in the outer parts of the Borough. This could help to enhance the accessibility of employment opportunities for residents outside of the central areas of Ipswich, thereby helping to tackle poverty, deprivation and exclusion in these areas. At the same time, people in central areas could potentially have more limited access to this employment development.</p>
2 - To meet the housing requirements of the whole community	++	<p>LT M</p> <p>The proposed spatial strategy would be expected to facilitate the delivery of enough housing, including a large proportion of affordable housing and other types of housing, to satisfy the diverse and growing needs of Ipswich's population to 2036.</p>
3 - To improve the health of the population overall and reduce health inequalities	+	<p>LT M</p> <p>By focussing new development in central areas of Ipswich where practicable, it is likely that the majority of new residents in Ipswich would be within walking distance of key health facilities including GP surgeries, leisure facilities and exercise opportunities. They would also have good access to Ipswich Hospital. Where residents are slightly too far to walk, or prefer not to walk, they would have excellent public transport options for accessing health facilities due to the prevalence of local bus services in the centre. It should be noted that access to diverse semi-natural habitats, which can be highly beneficial to people's physical and mental health and wellbeing, is generally more limited in these areas than it is in the outer areas of Ipswich. However, health benefits from an increase in walking and/or cycling, as well as the subsequent increase in community interaction, could have significant benefits for both physical and mental health. New residents in residential developments outside the central areas will be within walking distance of local health facilities, leisure facilities and exercise opportunities. Where these are beyond walking distances, they will be accessible by other means of sustainable transport such as cycling and bus links.</p> <p>The local planning authority has negotiated with key stakeholders regarding the provision of health care services and relevant levels of contribution has been agreed to offset the impact of new development.</p> <p>The proposed spatial strategy allows for the delivery of new homes and employment development that would make a significant contribution towards tackling poverty, deprivation, homelessness and unemployment, which in turn would be highly beneficial to the physical and mental health and wellbeing of local people.</p> <p>Generally speaking, the level of air pollution in the centre of Ipswich is worse than in outer areas. Focussing new development here, where practicable, could potentially risk exposing a portion of new residents to dangerous levels of air pollution, such as those near AQMAs. However, in the long term, this effect could be minimised through the implementation of the strategy to reduce the need to travel.</p>
4 - To improve the quality of where people live and work	+/-	<p>LT M</p> <p>Residents living in urban locations would be likely to have to deal with higher levels of air, noise and light pollution and disturbances, such as that associated with road transport or construction works, than those living in more rural locations, particularly if they live near AQMAs. This could adversely affect the quality of lives at home for new residents.</p> <p>It is expected that the density of new development in central locations would generally be higher than the density of development in the outer areas of the Borough. It is somewhat uncertain the extent to which this higher density development could allow for outdoor amenity space that makes a positive</p>



SA Objective	Effect	Commentary
		<p>contribution towards high quality livelihoods at home for new residents. At the same time, the proposed spatial strategy recognises the importance of family housing being lower density to enable high quality family livelihoods at home, which could lead to some positive effects against this objective.</p> <p>The proposed spatial strategy is committed to the principle of high quality architecture and urban design and which enhances the security and safety of residents. It is therefore likely that new residential development delivered through this strategy generally affords people a high quality home environment. In many cases this could lead to the regeneration of deprived locations or derelict land, that enhances the quality of life for existing residents in the neighbourhood.</p> <p>With development being generally directed away from countryside or rural locations, where appropriate, it is likely that the quality living environment enjoyed by people in these locations would be unlikely to be at risk as a result of new development taking place.</p>
5 - To improve levels of education and skills in the population overall	++	<p>The proposed spatial strategy would help to ensure that new residents have excellent access to education facilities, including nurseries, primary schools, secondary schools and further education opportunities, which are prevalent throughout the central areas of Ipswich. These residents would likely be within walking distance of these education opportunities but, where they are not, they would also have excellent public transport options for travelling there. In addition, developments outside the central areas would be expected to provide educational infrastructure on-site or contribute to improving existing provision where needed.</p> <p>The local planning authority has liaised with Suffolk County Council, as education provider, in terms of the forecast levels of demand arising from the proposed spatial strategy. This has been reflected through a Statement of Common Ground between the two parties and agreed position in respect of infrastructure provision.</p> <p>The proposed spatial strategy allows for significant levels of employment development, including of a diverse range of types, which could significantly enhance on-the-job skills learning opportunities for local people, particularly as the majority of new employment development (albeit not all) would likely be in highly accessible locations via walking and cycling.</p>
6 - To conserve and enhance water quality and resources	+/-	<p>Most of Ipswich falls within a groundwater source protection zone 3, and so new development delivered via the proposed spatial strategy could pose a risk to the quality of groundwater. However, this avoids the more sensitive groundwater source protection zones outside of the central areas in the north and south of Ipswich. The proposed spatial strategy therefore presents the lower risk in terms of the potential to adversely affecting the quality of groundwater.</p> <p>Development in the more central and urban areas of Ipswich would be expected to pose less of a risk to surface water quality than development in more rural locations. This is because the proposed spatial strategy would allow for significant brownfield development opportunities, where greenfield land would not be lost and where there would be fewer discernible effects on surface run off. In greenfield sites identified outside the central areas, the Local Plan Review has consulted stakeholders, to ensure that the requirement to protect groundwater supply is not adversely affected and work has been completed on the Water Cycle. In addition, the local plan clearly identifies flood risk constraints and the need for these to be appropriately addressed, ensuring that sites, such as Humber Doucy Lane, have been included specifically in the Strategic Flood Risk Assessment (SFRA) refresh.</p> <p>It should also be noted that development in the more urban and central locations of the Borough could also allow for more efficient use of existing sewerage systems that better protects water quality, however this effect is uncertain.</p> <p>However, it is likely that new development would be situated in proximity to, or adjacent to, the River Orwell, Neptune Marina, and/or the River Gipping. Whilst it is likely that new development would adopt best-practice measures to protect water quality, it could prove difficult to prevent adverse effects on the quality of these waters, in all cases, as a result of all development in-combination.</p> <p>The scale of the new development delivered through this spatial strategy would be expected to result in a net increase in the consumption of the water resource in Ipswich, which could also lead to an overall negative cumulative effect.</p>

SA Objective	Effect	Commentary
7 - To maintain and where possible improve air quality	+/- LT M	<p>The proposed spatial strategy would situate around half all new residents in locations that are highly accessible via walking and cycling and are within walking/cycling distance of key services and amenities such as shops, schools and health facilities. New development outside the central areas would have access to local services and amenities, as well as sustainable transport modes to facilities into the wider area. Should residents choose not to walk or cycle, which may be likely given the relatively limited presence of designated cycle paths in Ipswich, the prevalence of public transport options, particularly buses, could help to further reduce the rates of car driving for new residents. The majority of new employment development would also be in these locations, thereby affording employees the opportunity to commute to and from work via low-polluting modes.</p> <p>Whilst the proposed spatial strategy could help to limit the air pollution associated with new development, the air quality in the central areas of Ipswich is generally poorer than in more rural locations and there are currently four AQMAs designated in the centre. New development here could make achieving air quality improvement targets increasingly difficult.</p>
8 - To conserve and enhance soil and mineral resources	+/- LT M	<p>In general, the approach of directing the majority of new development towards existing urban areas, where practicable, would increase the opportunities for development on brownfield sites. This would help to minimise the loss of agriculturally and ecologically important soils caused by new development. Such losses would not be avoided in all cases, given that the proposed spatial strategy would facilitate major new development at Ipswich Garden Suburb, as well as the Humber Doucy Lane area, where large quantities of greenfield land and soils would likely be lost to development. In some cases, this would be likely to include some of the Borough's best and most versatile soils of high agricultural value. Where this is the case, it will be particularly important to ensure that best practice measures are employed to protect the soil resource and re-use as much as possible.</p>
9 - To promote the sustainable management of waste	+ LT M	<p>Options for reusing buildings and recycled materials, as well as opportunities for residents and businesses to recycle waste, may be greater in the urban areas of Ipswich. The proposed spatial strategy would also facilitate significant levels of new development on brownfield sites, which could present opportunities for reusing existing materials and structures on-site that would help to limit the material resources use and waste arisings.</p>
10 - To reduce emissions of greenhouse gases from energy consumption	+ LT M	<p>The proposed spatial strategy would be expected to situate nearly all new residents at locations where they have excellent access to active travel and public transport links. Residents would also be living in locations where only short journeys, that are predominantly walk-able, are required to access the range of key services, facilities and amenities they rely on day-to-day. This would help to minimise the GHG emissions associated with the movements of new people. In some cases, new employment development might take place in out of town centre locations where access via walking or cycling could be more limited, particularly for those living in central locations.</p> <p>Furthermore, the focus on brownfield and urban locations could help to minimise the risk of greenfield, which is an important carbon sink, being lost to new development. It also allows for greater opportunities for reusing existing construction materials and structures at the brownfield locations, which would help to minimise the carbon footprint of new development.</p> <p>The proposed spatial strategy allows for a range of different densities of new development. Where the densities are greater, such as at small brownfield locations in the centre of the urban area, there may be more limited opportunities for including renewable energy generating measures such as solar panels, than in for more spacious development on the edge of the urban area. At the same time, the denser developments could facilitate more efficient energy networks such as energy efficient district heating.</p>
11 - To reduce vulnerability to climatic events and flooding	+/- LT M	<p>Large swathes of Ipswich are in Flood Zones 2 and 3, particularly on land in proximity to the rivers and marina. It is expected that the proposed spatial strategy would lead to the majority of new development being situated outside of the flood risk zones, but not all. Where new development is situated in these flood zones, the homes, businesses and people here more vulnerable to the potential impacts of climate change. It is recognised that some development taking place in the flood</p>

SA Objective	Effect	Commentary
		<p>zones is, to some extent, unavoidable for any spatial strategy given the land-constrained nature of the Borough.</p> <p>Aside from flooding, climate change will also lead to more extreme weather and temperatures. The proposed spatial strategy minimises the loss of greenfield land and important GI elements that help to control the climate. New development in urban and brownfield locations presents opportunities for enhancing the GI and tree coverage in these locations, better enhancing their resilience to the temperate and weather impacts of climate change.</p>
12 - To safeguard the integrity of the coast and estuaries	-	<p>LT M</p> <p>The proposed spatial strategy directs the significant majority of new development away from locations where there could conceivably be potential impacts on the coast and estuaries, including their distinctive character, valuable biodiversity and sensitive cultural heritage.</p> <p>In some cases, the proposed spatial strategy would lead to new development taking place in proximity to the rivers and Neptune Marina, which are hydrologically linked with the coast and estuaries. In such cases, there is a potential risk of adverse water quality effects at the rivers or Marina leading to potential effects on the coast and estuaries. A high level of pollution or contamination would likely be required to result in discernible effects on the coast/estuaries, which would likely be avoided in most cases but cannot be entirely discounted at this stage.</p>
13 - To conserve and enhance biodiversity and geodiversity	-	<p>LT M</p> <p>The proposed spatial strategy would direct new development towards central and more urban areas, where practicable, where there is more limited scope for adverse effects on biodiversity. This is due to the more limited presence of designated biodiversity sites, and because brownfield sites are typically of less biodiversity value than greenfield sites. Developing on brownfield would be likely to present opportunities to deliver biodiversity net gains.</p> <p>However, not all development would be brownfield and adverse effects on biodiversity as a result of, for example, the Ipswich Garden Suburb could risk the loss of diverse habitats and potential effects on protected species. It should be noted that surveys and means of mitigation for the Ipswich Garden Suburb have been agreed through planning permissions and the supplementary planning document for the area.</p> <p>In some cases, it is likely that development would take place in proximity to the River Gipping, River Orwell and the Neptune Marina. These are important wildlife corridors that are also hydrologically linked with the River Orwell SPA/SSSI and so it will be important to ensure that any sites in these locations have been considered through the HRA process.</p>
14 - To conserve and where appropriate enhance areas and assets of historical and archaeological importance	-	<p>LT M</p> <p>The central and urban areas of Ipswich are home to a higher density of cultural heritage assets than countryside locations, including Listed Buildings, Scheduled Monuments and the Conservation Areas. Whilst residential development would be largely in-keeping with the existing built form, and the lay of the land would prevent development from impacting long distance views, it may be difficult to avoid adverse impacts on heritage assets in all cases.</p> <p>At the same time, the proposed spatial strategy is focussed on regenerating brownfield land and rejuvenating deprived neighbourhoods. It is considered to be likely that in many cases, such development could deliver enhancements to the setting of sensitive heritage assets or historic areas.</p> <p>The proposed Ipswich Garden Suburb would be likely to significantly alter the setting of nearby heritage assets. The potential impact on these heritage assets has been considered through planning permissions and the supplementary planning document for the area.</p> <p>The proposed allocation at Humber Doucy Lane may also impact on the setting of nearby heritage assets. A Statement of Common Ground with Historic England is being progressed, including the provision of a Heritage Impact Assessment for the area, which will help to address this.</p>
15 - To conserve and enhance the quality and local distinctiveness	+/-	<p>LT M</p> <p>The proposed spatial strategy allows for a range of development densities. The distribution also helps to ensure that new residential or employment development would be in proximity to existing, similar, land-uses. This could help to ensure that new development does not significantly discord with the local townscape or landscape character. The proposed spatial strategy is focussed on regenerating</p>

SA Objective	Effect		Commentary
of landscapes and townscape			<p>brownfield land and rejuvenating deprived neighbourhoods. It is considered to be likely that in many cases, such development could deliver enhancements to the local townscape character.</p> <p>At the same time, not all sites would be derelict or brownfield and some degree of greenfield loss is likely. Furthermore, the proposed spatial strategy allows for major new development such as the Ipswich Garden Suburb. Whilst they would be expected to be of a high quality design, they would be likely to alter the local sense of place and character and an adverse effect cannot be ruled out for such sites.</p>
16 - To achieve sustainable levels of prosperity and growth throughout the plan area	++	LT M	<p>The proposed spatial strategy could make a significant contribution towards growth and prosperity. The proposed spatial strategy would facilitate a level of employment and economic development that satisfies Ipswich's growing needs, whilst also helping to diversify the local jobs market. The distribution of development would help to ensure that residents have excellent access to the diverse range of new and existing employment opportunities, including via active travel and public transport links, whilst new employment sites would also be in generally highly accessible locations.</p>
17 - To maintain and enhance the vitality and viability of town and retail centres	++	LT M	<p>The proposed spatial strategy could make a significant contribution towards enhancing the vitality and vibrancy of town centres. The distribution of development through the proposed spatial strategy would direct new development towards central locations of Ipswich, where practicable. In many cases, this would be likely to deliver new investment and regeneration opportunities to vacant or derelict locations in the centre. This would enhance the local vibrancy and vitality. New residents would also be within a short, and often walkable, distance of town and district centres. This could lead to an increase in footfall in these centres that further enhances their vibrancy and vitality. Outside the central areas sites have incorporated the need to provide means of access to services and facilities without recourse to the private car. This is a key element for the development of such sites. In addition, they are located close to local facilities.</p> <p>The proposed spatial strategy allows for significant levels of employment and economic development that would be likely to boost the economy of these central areas. In addition, the strategy seeks to focus new retail development into the Central Shopping Area in the town centre.</p>
18 - To encourage efficient patterns of movement, promote sustainable travel of transport and ensure good access to services	++	LT M	<p>The proposed spatial strategy would be expected to situate nearly all new residents at locations where they have excellent access to active travel and public transport links. It is considered to be likely that this distribution of development would facilitate high rates of walking and cycling, although it should be noted that cycling infrastructure, such as designated cycle paths, is somewhat limited across Ipswich and it is unclear whether this distribution of development would discernibly improve rates of walking or cycling relative to current levels. Where new development is proposed for out of town centre locations, it will be particularly important to ensure good access via walking and cycling links for people in more central locations. Examples of this include the proposed green trail around the edge of the Borough which new developments such as the northern end of Humber Doucy Lane will need to positively include and contribute towards. Access to bus links would be likely to be particularly strong, whilst access to railway stations could potentially vary somewhat depending on the precise location of development.</p> <p>New homes would be situated in locations that require only short journeys to reach the various services, facilities and amenities that people rely on for their daily needs. New employment sites would be likely to be situated in locations where employees can reach them from their homes using active or public travel modes.</p>
19 - To ensure that the digital infrastructure available meets the needs of current and future generations	+	LT M	<p>It is uncertain the extent to which digital infrastructure in Ipswich is currently capable of adapting to future technological needs, such as 5G technology, and it is uncertain the extent to which this distribution of development could enhance this. However, the distribution of development is such that most new residents or employment sites would be in an existing settlement and built up area which generally have good access to digital infrastructure. Policy DM34 of the Local Plan Review requires the provision of new digital infrastructure as part of new development. New homes will need to ensure that residents have access to the internet and in some cases this</p>

SA Objective	Effect	Commentary
		could lead to improvements to the local digital infrastructure that benefits new and existing residents.

## 3 Justification for the Preferred Spatial Option

### 3.1 Overview

As required in the SEA Directive, it is necessary for an SA to outline the reasons for selecting the preferred option, in light of the reasonable alternatives dealt with (Article 9.1(b)). This section provides an overview of the Council's reasoning for their preferred spatial option for the Plan, in light of the reasonable alternatives assessed as part of the SA.

#### SEA Regulations Article 9:

1. Member States shall ensure that, when a plan or programme is adopted, the authorities referred to in Article 6(3), the public and any Member State consulted under Article 7 are informed and the following items are made available to those so informed: ...

(b) ... **the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with,**

SEA Guidance from the Office of the Deputy Prime Minister (2005)<sup>3</sup> states that “*only reasonable, realistic and relevant alternatives need to be put forward*”.

The SEA Directive and associated legislation do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Should an option be considered to be clearly so unreasonable that no reasonable person acting reasonably could have made it, then it is considered that it would not constitute a ‘reasonable alternative’. **Ultimately, the determination as to whether an option is reasonable or not is typically an evaluative and qualitative assessment for the planning authority.**

In ‘R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] Env LR 1’, Hickinbottom J summarised the law relating to reasonable alternatives:

“iv) “Reasonable alternatives” does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.

v) Article 5(1) refers to “reasonable alternatives taking into account the objectives... of the plan or programme...” (emphasis added). “Reasonableness” in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. An option which will, or sensibly may, achieve the objectives is a “reasonable alternative”. The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no “reasonable alternatives” to it.

vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”

### 3.2 What Spatial Strategy Options Have Been Considered?

Over the course of the Plan-making process the Council has considered six reasonable alternatives for the spatial strategy. These were appraised in full in the SA, the full results of which are presented in Appendix C (p.28) of the Final Draft SA Report<sup>4</sup>. After reviewing their options, including their sustainability implications as

<sup>3</sup> Office of the Deputy Prime Minister, Practical Guide to the Strategic Environment Assessment Directive, available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>4</sup> Appendix C is available on the Council's website at:

[https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich\\_lp\\_sustainability\\_appraisal\\_report\\_appenices\\_a\\_-\\_c.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_lp_sustainability_appraisal_report_appenices_a_-_c.pdf)

identified in the SA work, the Council proposed their preferred option for the spatial strategy. This is the spatial strategy in Policy CS2, the SA findings of which is presented in section 2 of this addendum.

Table 3.1 provides an overview of the SA findings for the seven spatial strategies, including the six reasonable alternatives and the preferred options, bringing together the effect scores predicted for each spatial strategy option for each SA Objective. The SA Objectives are as follows:

1. To reduce poverty and social exclusion
2. To meet the housing requirements of the whole community
3. To improve the health of the population overall and reduce health inequalities
4. To improve the quality of where people live and work
5. To improve levels of education and skills in the population overall
6. To conserve and enhance water quality and resources
7. To maintain and where possible improve air quality
8. To conserve and enhance soil and mineral resources
9. To promote the sustainable management of waste
10. To reduce emissions of greenhouse gases from energy consumption
11. To reduce vulnerability to climatic events and flooding
12. To safeguard the integrity of the coast and estuaries
13. To conserve and enhance biodiversity and geodiversity
14. To conserve and where appropriate enhance areas and assets of historical and archaeological importance
15. To conserve and enhance the quality and local distinctiveness of landscapes and townscape
16. To achieve sustainable levels of prosperity and growth throughout the plan area
17. To maintain and enhance the vitality and viability of town and retail centres
18. To encourage efficient patterns of movement, promote sustainable travel of transport and ensure good access to services
19. To ensure that the digital infrastructure available meets the needs of current and future generations

Table 3.1: Effect scores predicted for each spatial strategy option for each SA Objective

Option	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
<b>Reasonable alternatives</b>																			
1: Higher-density urban regeneration	++	+	+	-	+	+/-	+/-	+	+	+	+/-	+	+	+/-	+	++	++	++	+
2: Increased development beyond the Borough boundary	+/-	++	+	++	+	+/-	-	--	-	-	-	-	-	+/-	--	+	++	-	+/-
3: Change the use of existing land in the Borough to housing	+/-	+	+	+/-	+	-	+/-	+/-	+/-	-	+/-	+/-	-	-	-	+	+	+/-	+/-
4: Continuation of existing approach (East Suffolk)	+	++	++	+	+	+/-	-	-	+/-	-	+/-	-	-	-	-	+	+	-	+/-
5: Focus on Ipswich and A14 transport corridor (East Suffolk)	+	++	++	+	+	+/-	-	-	+/-	-	+/-	+/-	-	-	-	+	+	-	+/-
6: A12 transport corridor and dispersed rural focus (East Suffolk)	+	++	++	+	+	+/-	-	--	-	-	-	+	-	-	-	+	+/-	-	+/-
<b>Preferred spatial strategy</b>																			
Preferred option: Policy CS2	++	++	+	+/-	++	+/-	+/-	+/-	+	+	+/-	-	-	-	+/-	++	++	++	+

### 3.3 Reasons for Choosing the Spatial Strategy

The spatial approach to delivering sustainable growth in Ipswich is to pursue a strategy of urban renaissance in central Ipswich. This continues a well-established approach in the Borough that has seen a transformation of the Ipswich Waterfront, and the beginnings of change to a more vibrant mixed use area in the Portman Quarter (formerly Ipswich Village). It offers the most sustainable way to accommodate growth in Ipswich, because, in light of the reasonable alternatives considered:

- It makes the best use of previously developed land;
- It places new residents in proximity to jobs, shops, leisure and cultural facilities and public transport nodes, to support sustainable lifestyles;
- It regenerates some of the more run down areas that surround the historic core;
- It enhances the vitality and vibrancy of the central area, reinforcing its role as a county town and regional centre;
- It addresses social needs by tackling issues of social and economic deprivation; and
- It recognises the need for lower density family housing

The strategy also reflects Ipswich's role as the County Town, to help address issues of social and economic deprivation and, in places, a poor quality physical environment and social infrastructure.

Focusing development into central Ipswich, where practicable, will contribute to tackling issues of deprivation and improving social inclusion, for example through locating jobs and services where they will be most accessible. In pursuing the strategy, the Council will work with community partnerships to ensure that the benefits of growth reach deprived neighbourhoods.

Much of the central area of Ipswich alongside the river is classified by the Environment Agency as Flood Risk Zones 2 and 3. National policy (National Planning Policy Framework (NPPF)) requires a sequential approach to the location of development, such that Flood Zones 2 and 3 are avoided if there are viable alternatives. In exceptional circumstances 'more vulnerable' development, such as housing or education development in Flood Zones: 2 and 3 may be possible if 'within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and development is appropriately flood resilient and resistant, including safe refuge, access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.'

Ipswich is constrained by its tightly drawn borough boundary. The Borough has already accommodated significant post-war growth such that there are few opportunities for further expansion at the periphery. Thus, as well as the need for urban regeneration in central Ipswich, there is no realistic alternative to locating some development in Flood Zone 3.

In place is an adopted Ipswich Flood Defence Management Strategy. Work to replace and raise the height of the floodgates in the Wet Dock lock is now complete. The flood defence strategy will reduce flood risk significantly. However, the residual risks resulting from the possibility of overtopping, breach or failure of gates or walls need to be considered. All development needs to be safe and when 'more vulnerable' developments need to be sited in Flood Zone 3a, they should pass the sequential and exception tests described in the NPPF. The Council's Level 2 Strategic Flood Risk Assessment (SFRA) was revised in 2019. It provides guidance on residual flood risk both for the situation before and after completion of the flood barrier. The SFRA also suggests a framework for safe development. The safety framework is detailed in the Council's Development and Flood Risk Supplementary Planning Document (September 2013), which is in the process of being updated and includes requirements for:

- Structural safety of buildings;
- Emergency plans for actions by emergency responders;
- Emergency plans for evacuation and flood warning arrangements for users of buildings;
- Temporary refuges;
- Safe emergency access for Fire & Rescue Service;
- Safe access/escape routes for building users;



- Raised floor levels; and
- Flood resilience measures.

Thus, a significant number of Ipswich's new homes will be provided within central Ipswich through sites that will be identified in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. As a secondary source of sites, land in the remainder of the urban area will also be identified, where possible located so as to provide ready accessibility for residents to existing local or district centres.

Alongside the focus on the central area, the delivery of a significant number of homes through a sustainable urban extension on greenfield land at the Ipswich Garden Suburb will also occur during the plan period (see policy CS10). A cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, is also identified in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road. The allocation will be joint master planned with East Suffolk Council who have allocated land adjoining the Ipswich Borough boundary adjacent to the allocation within the Borough. This joint approach will help to enable land within Ipswich Borough to come forward for housing. The sites identified in the northern edge of Ipswich are designed to meet the identified need for additional larger homes at lower densities as identified in the Strategic Housing Market Assessment. This need cannot be met as part of the regeneration areas of central Ipswich, as by the nature of their location, these homes will be a mixture of more dense houses and flatted development.

Ipswich is a regional town centre. Through the Local Plan and the preferred spatial strategy, the Council will:

- Amend the Central Shopping Area boundary to provide for improved retail offer (sites for new retail development are allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document);
- Define the town centre boundary and identify within it employment areas and sites for offices, hotels, and commercial leisure uses (again, sites will be identified in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document);
- Support the growth of the University of Suffolk and Suffolk New College, e.g. by protecting the Education Quarter land and buildings for linked uses; and
- Support cultural and leisure facilities in the centre to attract visitors into the centre.

The two documents (the statutory 'Local Plan' and the 'Vision for Ipswich') are considered to complement each other in a helpful way. Ipswich is a key economic driver in the wider sub-region. Whilst the town centre is the hub of office-based activity, retail and leisure activity, and offers the opportunity for clusters to develop around the University Campus, and Ipswich Port is a focus for storage and distribution linked to marine trade, land is needed across the Borough to enable the provision of a range of new jobs across employment growth sectors. The Core Strategy sets out an approach to protecting employment sites and employment areas across the town to meet a variety of needs.

Employment land allocations themselves will be made through the site-specific development plan document. The Core Strategy will also provide an opportunity to attract national and regional voluntary sector organisations to form a base in Ipswich and promote the growth of social enterprise incubator units and voluntary sector activity.

Although the town centre is the focus for regeneration, many of the town's existing residents live in the suburbs. The town centre improvements will benefit those who use the centre, and efforts to encourage modal shift will support accessibility around the Borough by public transport, cycling and walking. In suburban neighbourhoods benefits from growth could include additional jobs provided in the established employment areas, the provision of additional community facilities and urban greening.

## 4 Conclusions

This Addendum has:

- Presented the SA appraisal results of the Council's preferred spatial option in Section 2; and
- Provided an overview of the reasons for the Council's preferred spatial option, in light of the alternatives dealt with, in Section 3;

The effects recorded for the spatial strategy are summarised in Table 5.1 below.

Table 5.1: Summary of effect scores recorded for the proposed spatial strategy

Option	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
<b>Preferred spatial strategy</b>																			
Preferred option: Policy CS2	++	++	+	+/-	++	+/-	+/-	+/-	+	+	+/-	-	-	-	+/-	++	++	++	+

It is anticipated that this Addendum would be provided to the Inspector.

Should any further SA related matters arise it may be necessary to carry out further SA work to address this. In the absence of this, it is expected that the next stage of the SA would be to prepare an SEA Post Adoption Statement in accordance with Article 9 of the SEA Directive:

### Article 9 - Information on the decision

1. Member States shall ensure that, when a plan or programme is adopted, the authorities referred to in Article 6(3), the public and any Member State consulted under Article 7 are informed and the following items are made available to those so informed:

(a) the plan or programme as adopted;

(b) a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and

(c) the measures decided concerning monitoring in accordance with Article 10.

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