

Appendix 5

Draft Ipswich Borough Council Local Cycling and Walking Infrastructure Plan Habitats Regulations Assessment Screening Statement

Ipswich Borough Council

Habitats Regulations Assessment Screening Report for the Ipswich Borough Council Draft Local Cycling and Walking Infrastructure Plan.

Introduction

Ipswich Borough Council is preparing a Draft Local Cycling and Walking Infrastructure Plan (LCWIP). The Draft LCWIP has been prepared to encourage the uptake of active modes of travel, such as walking, wheeling and cycling through new infrastructure. It will also have the benefit of reducing pollution and improving air quality. The LCWIP will apply to the whole of the Ipswich Borough Council authority area.

The Draft LCWIP will help to implement the following policies set out in the Ipswich Local Plan (2022):

Policy ISPA2 ‘Strategic Infrastructure Priorities’

The Council will work with partners such as the other local planning authorities in the ISPA, Suffolk County Council, Clinical Commissioning Groups, utilities companies, Highways England and Network Rail in supporting and enabling the delivery of key strategic infrastructure, and in particular the timely delivery of:

- a) A12 improvements;*
- b) A14 improvements;*
- c) Sustainable transport measures in Ipswich;*
- d) Improved cycle and walking routes;*
- e) Appropriate education provision to meet needs resulting from growth;*
- f) Appropriate health and leisure provision to meet needs resulting from growth;*
- g) Appropriate provisions to meet the needs of the police; community cohesion and community safety;*
- h) Green infrastructure and Suitable Alternative Natural Greenspace (SANG);*
- i) Improvements to water supply, foul sewerage and sewage treatment capacity; and*
- j) Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses.*

The Council also supports work to investigate the provision of increased capacity on railway lines for freight and passenger traffic, but these are not measures needed to enable the delivery of growth proposed through this Local Plan.

Policy CS5 ‘Improving Accessibility’

Development should be located and designed to minimise the need to travel and enable access safely and conveniently on foot, by bicycle and by public transport (bus and rail). This will encourage greater use of these modes. Transport Statements and Assessments should test the impact of development proposals on modal shift across the wider network and should demonstrate that they will support the achievement of at least a 15% modal shift, in accordance with the ISPA Transport Mitigation Strategy. The Council will work with the Highway Authority including through the Local Transport Plan and the Suffolk County Council Transport Mitigation Strategy, to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network.

The Council will support the expansion of electronic communications networks throughout the plan area as a means to support economic growth and enable home working, and thus reduce the need to travel.

The Council also recognises that some journeys will need to be made by car. The vitality and viability of the Town Centre depends on people being able to access it by a variety of modes. This will be managed through policies for car parking.

The Council will work with partners to promote the inclusive and age-friendly design of buildings, public spaces, highways and transport infrastructure.

Policy CS20 ‘Key Transport Proposals’

The Council supports key transport proposals needed to mitigate the traffic impacts within Ipswich of planned growth within the Ipswich Strategic Planning Area. These may include:

- a) Measures to increase bus usage such as a quality bus partnership or demand responsive transport;*
- b) Promoting ‘Smarter Choices’ and requiring travel planning for larger new developments;*
- c) The use of new and emerging technologies and the delivery of more electric vehicle charging points;*
- d) Reviewing park and ride provision, with an ambition to re-establish the Bury Road Park and Ride service and site and exploring the feasibility of a new park and ride facility at Nacton Road;*
- e) Adopting an Ipswich Town Centre parking plan;*
- f) Enhancing cycling and walking infrastructure;*
- g) Infrastructure improvements where necessary; and*
- h) Exploring longer term legislative measures to help improve air quality.*

The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the National Highways capital funding programme and bidding for other relevant funds.

The Council will support further measures to facilitate cycling and walking in the Borough, including crossings of the river and railway lines to improve connectivity between residential communities and jobs, services or facilities and transport hubs, and to prioritise pedestrians and cyclists in Ipswich Town Centre. The Council will also support ongoing work to examine the feasibility of a Wet Dock Crossing, which may consist of Bridges B and C of the Upper Orwell Crossings project and, notwithstanding the results, measures to enable the redevelopment of the Island Site (site IP037).

Land allocations or safeguarding for transport facilities are detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review and Policy CS10/ Table 8B for Ipswich Garden Suburb.

Policy DM10 ‘Green and Blue Corridors’

The Council will seek to establish and enhance green and blue corridors within the Borough and linking to adjacent open spaces and walking, cycling or riding routes. Green corridors are identified broadly on Plan 6 in the following locations:

- a) Between Bramford Lane Allotments and Whitton Sports Centre playing fields and grounds, Whitton Church Lane and adjoining countryside;*

- b) Between Christchurch Park, the Dales, playing fields north of Whitton Church Lane and adjacent countryside;*
- c) Between Christchurch Park, the Fonnereau Way, green infrastructure within the Ipswich Garden Suburb development area and open countryside beyond;*
- d) Between the Cemetery, Playing Fields at Tuddenham Road and adjacent countryside;*
- e) Between Woodbridge Road and Bixley Heath via St Clement's Hospital grounds;*
- f) Between Alexandra Park and Orwell Country Park and surrounding countryside via Holywells Park, Landseer Park and Pipers Vale;*
- g) Between the Gipping Valley path near Station Bridge and Belstead Brook Park and adjacent countryside via Bourne Park;*
- h) Between Gippeswyk Park, Belstead Brook Park and adjoining countryside;*
- i) Between Gippeswyk Park, Chantry Park and adjacent countryside; and*

The blue corridor is identified broadly on Plan 6 in the following location:

- j) Between the Wet Dock and Sproughton Millennium Green and adjacent countryside along the river corridor.*

Development within the green and blue corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions. The Council will seek to establish attractive green links and to provide for public access wherever safe and practicable.

Opportunities will be sought to link existing green and blue corridors into a more continuous network through the layout of new development, the provision of new open spaces or public realm improvement. Development proposals which break or disrupt an existing corridor without being able to form an acceptable and useable alternative route in the network will be refused.

A further "blue" corridor (j) can be identified, comprising the length of the navigable River Gipping and River Orwell within the Borough. Development proposals which relate closely to riverbanks will be required to provide for the improvement of public pedestrian and cycle paths along the site boundary relating to the river where appropriate and should enhance its appearance. Development close to riverbanks should also include tree planting and ensure that an appropriately sized ecological buffer along the river is maintained. Development should seek to enhance public slipway access to the river, where practicable.

The Council will seek to establish and extend a publicly accessible green trail around the edge of the Borough as illustrated on Plan 6 in order to address the need within the Borough for access to Natural and Semi Natural Greenspace. The green trail will provide an ecological corridor and a recreational resource for people to use. Development at the edge of the built up area will be required to provide links within the green trail as part of their on-site open space provision.

Policy DM12 'Design and Character'

The Council will require all new development to be well-designed and sustainable. In the plan area this will mean layouts and designs that provide a safe, and attractive public realm capable of being used by all. They will:

- a) form areas which function well by integrating residential, working and community environments and which fit well with adjoining areas;*
- b) create safe and secure communities by complying with the relevant secure by design guidance where appropriate to do so and taking account of building safety requirements under other legislation from the outset, including fire safety, access for emergency services and safe access for evacuation;*

c) include useable public spaces for all (including pedestrians, cyclists and people with disabilities) that are easily understood and easy to pass through;

d) introduce greener streets and spaces to contribute to local biodiversity net gain, visual amenity, and health and well-being, and offset the impacts of climate change. This could include green roofs, walls and other measures to ensure the urban environment becomes greener and healthier;

e) incorporate cycle and waste storage, public transport infrastructure and car parking (including electric vehicles) if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity and allows sufficient permeability for public transport, refuse collection and emergency vehicles;

f) in residential development of 10 or more dwellings, 25% of new dwellings will be required to be built to Building Regulations standard M4(2). The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.

Proposals should also respect and promote the special character and local distinctiveness of Ipswich by:

g) protecting and enhancing significant views that are considered to be important or worthy of protection, including those set out in the Ipswich Urban Character Studies, Conservation Area Appraisal and Management Plans, as well as the setting of any heritage assets. The design should help to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene;

h) ensuring good public realm design that enhances the streetscape and protects and reinforces a sense of place, through the appropriate use of public art, bespoke paving, street furniture and soft landscaping; and

i) ensuring good architectural design that responds to and reflects its setting, is sustainable, accessible and designed for long life by being capable of adaptation to changing needs and uses over time and demonstrate the principles of dementiafriendly design.

Designs that do not adequately meet or address these criteria will be refused.

Policy DM21 'Transport and Access in New Developments'

To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:

a) not result in a severe impact on the highway network or unacceptable impacts on highway safety, either individually or cumulatively;

b) not result in a significant detrimental impact on air quality and shall address the appropriate mitigation measures as required in accordance with Policy DM3;

c) incorporate electric vehicle charging points, including rapid charging points in nonresidential developments;

d) provide a car club scheme or pool cars, where this would be consistent with the scale and location of the development;

e) prioritise available options to enable and support travel on foot, by bicycle or public transport, consistent with local strategies for managing the impacts of growth on the transport network, and ensuring that any new routes are coherent and in accordance with the design principles of Policy DM12 and local walking and cycling strategies and infrastructure plans;

f) have safe and convenient access to public transport within 400m, and facilitate its use through the provision or contributions towards services or infrastructure;

g) protect the public rights of way network and take appropriate opportunities to enhance facilities and routes;

h) ensure safe and suitable access for all users, including people with disabilities and reduced mobility;

i) allow for the efficient delivery of goods and access by service, refuse collection and emergency vehicles and bus permeability;

j) mitigate any significant impacts on the transport network; and

k) contribute as required to other mitigation measures identified through Policy CS20 and the ISPA Transport Mitigation Strategy, where this meets the planning obligation tests in set out in national policy.

Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated and how the development would contribute to achieving the modal shift target for Ipswich by 2031. The Council will expect major development proposals to provide an appropriate Travel Plan, having regard to the thresholds set out in the Suffolk County Council Suffolk Travel Plan Guidance, to explain how sustainable patterns of travel to and from the site and modal shift targets will be achieved. Development proposals will be accompanied by a satisfactory Transport Statement or Transport Assessment, having regard to the indicative thresholds below, which demonstrates that the cumulative impacts of the development after mitigation are not severe. A Transport Statement will generally be required for proposals for the development of:

l) 30 to 49 dwellings;

m) 1,500 – 2,499 sq. m of Use Class E(g) floorspace;

n) 2,500 – 3,999 sq. m of B2/B8 floorspace; and

o) 800 – 1,499 sq. m of Use Class E(a) floorspace.

A Transport Assessment will generally be required for proposals for the development of:

p) 50 or more dwellings;

q) 2,500 sq. m or more of Use Class E(g) floorspace;

r) 4,000 sq. m or more of B2/B8 floorspace; and

s) 1,500 sq. m or more of Use Class E(a) floorspace.

Policy DM22 ‘Car and Cycle Parking in New Development’

The Council will require all new development to have regard to adopted car and cycle parking guidance, and will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities and create a safe and attractive environment. The Council will also require the provision of integral secure cycle parking in any new car parks in the Town.

Car parking must be designed so as not to dominate the development or street scene or to result in the inefficient use of land.

There will be maximum standards of car parking provision with no minimum requirement for residential development within the IP-One Area, which has frequent and extensive public transport networks, and easy access to a wide range of employment, shopping, and other facilities.

A central car parking core is defined in the Town Centre, through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review. Within the central car parking core, only operational car parking will be permitted in connection with non-residential development, so that the stock of long-stay parking is not

increased. New, non-residential long-stay car parks, and on-street parking, will not be permitted within the central car parking core.

Within the whole IP-One Area, proposals for additional long-stay car parking provision over and above that proposed through Policy SP34 will not be permitted, unless the proposal can demonstrate that it would not harm the effectiveness of modal shift measures outlined in the SCC Transport Mitigation Strategy for the Ipswich Strategic Planning Area, nor have a severe impact on the highway network, which cannot be adequately mitigated.

New development will provide high quality, secure cycle storage, and within nonresidential developments of more than 1,000 sq. m or where more than 50 people will be employed, high quality shower facilities and lockers. These facilities should also be provided in minor non-residential developments unless it can be demonstrated that it is not feasible or viable. Cycle parking across the Borough is required to be secure, sheltered, conveniently located, adequately lit, step-free and accessible.

Policy SP8 ‘Sustainable Travel Infrastructure Outside the IP-One Area’

The Council will seek opportunities to deliver specific sustainable travel infrastructure improvements outside the IP-One Area through safeguarding sites/routes where necessary, new developments and/or seeking funding opportunities.

Throughout the Borough, development should improve linkages to the rights of way network, including cross boundary links, where opportunities exist to do so.

Pedestrian and cycle measures are supported outside the IP-One Area, specifically:

- a) A pedestrian and cycle bridge across the River Gipping in west Ipswich; and*
- b) A pedestrian and cycle bridge across the railway line at Felixstowe Road District Centre.*

The Park and Ride site at Anglia Parkway is safeguarded for future re-use for Park and Ride.

Policy SP32 ‘Improving Pedestrian and Cycle Routes in the IP-One Area’

The Council will support improvements to pedestrian and cycle routes within the IP-One Area and linking the Town Centre to residential areas and beyond. It will seek opportunities to deliver the following specific improvements through safeguarding routes where necessary, new developments and/or seeking funding opportunities:

- the provision of safe cycle and pedestrian access across the lock gates at the entrance to the Wet Dock to create a circular route;*
- the provision of new foot and cycle bridges across the New Cut linking Stoke Quay to St Peter’s Wharf and the Island Site to Felaw Street;*
- an improved pedestrian environment on key walking routes from the Waterfront to the Central Shopping Area - Turret Lane, Lower Brook Street, Foundation Street and Lower Orwell Street;*
- improved pedestrian links through Cardinal Park linking the Station and Central Shopping Area;*
- enhanced walking and cycling links between the Railway Station and the Waterfront via the river path;*
- improved pedestrian and cycle links from Handford Road to Sir Alf Ramsey Way;*
- improved pedestrian and cycle routes linking St Matthew’s Church, the New Wolsey Theatre, Westgate Street and the proposed cultural hub at High Street; and*
- the pedestrianisation of Princes Street North and Upper Brook Street.*

Policy SP33 ‘Transport Proposals in the IP-One Area’

The Council supports the aspiration identified in the Local Transport Plan for the provision of a new Wet Dock Crossing, linking the east bank in the vicinity of Toller Road with the west bank in the vicinity of Felaw Street. The crossing would facilitate access to the Island Site and may provide for through traffic. Its design would maintain boat access through the lock and navigation along the New Cut. The design and layout of development on the Island Site

IP037 should not prejudice the future delivery of a Wet Dock Crossing should a firm proposal be included in future updates of the Local Transport Plan. The potential route for a Wet Dock Crossing is shown on the IP-One Area Action Plan Inset Policies Map.

The Council also supports measures to improve pedestrian and cycle access between the Waterfront and Central Shopping Area.

The Draft LCWIP will seek to:

1. Set out a high-level strategic vision and objectives for active travel, and prioritised lists of new routes and route improvements proposed for each active travel mode; and
2. Set out a prioritised list of new walking, wheeling and cycling routes and improvements where needed within Ipswich.

What is the purpose of this statement?

The purpose of this statement is to assess the need for appropriate assessment in relation to the Draft Ipswich Borough Council LCWIP.

The LCWIP does not create new policy but provides detail in respect of the implementation of the adopted Ipswich Local Plan 2022 policies and schemes identified in the relevant SPD's listed above.

The LCWIP will set out a consistent and proportionate approach to identifying active travel opportunities in Ipswich, in addition to proposed developments, so that development can proceed in a timely, appropriate, legally compliant and policy compliant manner in Ipswich.

What is the legislative background?

The Habitats Directive (92/43/EEC) requires that an 'appropriate assessment' is carried out in relation to any plan or project which is likely to have a significant effect, either alone or in combination with other plans or projects, on European wildlife sites. Where an appropriate assessment is carried out, a plan may only be adopted after having ascertained that it will not adversely affect the integrity of the site concerned. This Directive was translated into British Law via the Conservation of Habitats and Species Regulations 2010, as amended. The regulations are often abbreviated to, simply, the 'Habitats Regulations' (Regulations 102 and 103 are of particular relevance).

European wildlife sites are those designated as Special Protection Areas (SPA) and Special Areas of Conservation (SAC). Ramsar sites should also be given the same level of protection, as stated within the National Planning Policy Framework. The Stour and Orwell Estuaries SPA and Ramsar site lies partly within Ipswich Borough. The 'Habitats Regulations Assessments¹ (Appropriate Assessment)' for the Ipswich Borough Council Local Plan 2011 – 2031 (adopted in February 2017), also identified a list of European sites outside the Borough, which may potentially be affected by development in Ipswich.

¹ Habitats Regulations Assessment (Appropriate Assessment) for Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review (The Landscape Partnership, November 2014)

- Habitats Regulations Assessment Addendum for Pre-Submission Modifications to the Ipswich Borough Council Core Strategy and Policies DPD Review (Proposed Submission stage) (The Landscape Partnership, September 2015)
- Habitats Regulations Assessment for Ipswich Borough Council Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (The Landscape Partnership, November 2014)
- Habitats Regulations Assessment Addendum for Pre-Submission Modifications to the Ipswich Borough Council Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (Proposed Submission stage) (The Landscape Partnership, September 2015)

The impact on those within a 15km radius from the boundary of Ipswich Borough was chosen as the area of search, which included:

- Hamford Water candidate SAC;
- Hamford Water SPA and Ramsar site;
- Deben Estuary SPA and Ramsar site;
- Sandlings SPA;
- Staverton Park and the Thicks SAC;
- Alde-Ore Estuary SPA and Ramsar site;
- Alde, Ore and Butley Estuaries SAC; and
- Orfordness – Shingle Street SAC.

The Process

The process to complete the Habitats Regulations Assessment involves a number of steps.

1. **Likely significant effect**
The Council, in consultation with Natural England, should decide whether or not the plan is likely to have a significant effect on any European site. This is a 'coarse filter' and any effect, large or small, positive or negative, should be considered.
2. **Connected to management of the site**
The Council should decide whether the plan is connected to the nature conservation management of the European sites.
3. **Screening**
The combination of decisions on likely significant effect and connections to management is often called 'screening'. If the plan is likely to have a significant effect and is not connected to the management of the site, an Appropriate Assessment is required.
4. **Scoping**
The whole plan must be assessed, but a 'scoping' exercise helps decide which parts of the plan have the significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process.
5. **Consultations**
Natural England is a statutory consultee. The public may also be consulted if it is considered appropriate, for example if the assessment is likely to result in significant changes to the plan.
6. **Iterations and revision**
The process is iterative; the conclusions of an initial assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue. It is normally expected that iterative revisions will continue until it can be ascertained that the plan will not have an adverse effect on the integrity of any European site.

Table 1 below screens the draft Ipswich LCWIP to assess whether Habitats Regulations Assessment is needed.

Table 1 Screening of the draft Ipswich LCWIP

HRA Step	Plan – Draft Development and Flood Risk SPD
Likely significant impact	<p>The draft Ipswich LCWIP would not have a significant effect on European protected sites. The purpose of the LCWIP is to assist the delivery of active travel schemes identified in the adopted Ipswich Local Plan 2022 and relevant SPD's. The LCWIP would ensure that these active travel schemes are taken into consideration when any relevant planning application is submitted, or when opportunities arise for obtaining funding to design and deliver these schemes. The Local Plan policies to which the Ipswich LCWIP relates to were themselves subject to Habitats Regulations Assessment (HRA) through the Local Plan preparation process.</p> <p>Therefore, the Ipswich LCWIP will not itself have any likely significant effects on European protected sites.</p>
Connected to the conservation management of the site	<p>No, the Ipswich LCWIP does not relate to the management of a site. The Ipswich LCWIP is the amplification of existing Local Plan policies and active travel schemes identified in the Cycle Strategy for Ipswich SPD and Town Centre and Waterfront Public Realm Strategy SPD. The 2022 Ipswich Local Plan HRA Adoption Statement of the Local Plan policies² is of particular relevance.</p>
Screening	<p>The Ipswich LCWIP is not connected to the conservation management of sites. Therefore, an appropriate assessment is not required. However, because of the relationship between the LCWIP and the adopted Local Plan, the Local Plan HRA of the policies outlined in this assessment is of particular relevance³.</p>

The Screening Assessment above of the Ipswich LCWIP refers to the HRA published alongside the preparation of the adopted 2022 Ipswich Local Plan (see footnote), the Ipswich LCWIP links most closely to the following policies:

- CS5 – Improving Accessibility
- CS20 – Key Transport Proposals
- DM10 – Green and Blue Corridors
- DM12 – Design and Character
- DM21 – Transport and Access in New Developments
- DM22 – Car and Cycle Parking in New Development
- SP8 – Sustainable Travel Infrastructure Outside the IP-One Area
- SP32 – Improving Pedestrian and Cycle Routes in the IP-One Area

²

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/habitat_regulations_assessment_adoption_statement.pdf

³ Ipswich Borough Council Local Plan Review 2018-2036 Habitat Regulations Assessment Adoption Statement March 2022.

- SP33 – Transport Proposals in the IP-One Area

What were the conclusions of the appropriate assessment?

The adopted Ipswich Local Plan 2022 was subject to ‘appropriate assessment’ under the Habitats Regulations as part of its production. The Regulation 19 Appropriate Assessment concluded that there would be no adverse effect on the integrity of European sites through the delivery of the Ipswich Local Plan, provided that a suite of mitigation measures was included in the plan that would address the identified impacts arising from recreational pressures.

The plan level appropriate assessment noted the key elements of mitigation but highlighted the need for further consideration and information gathering relating to mitigation, particularly in relation to measures on the European sites to manage access.

Key mitigation measures included for Ipswich Borough in the Local Plan include:

- the provision of a new Country Park;
- provision of green spaces as part of new development;
- visitor management measures for key European Sites; and
- monitoring the impact of recreational pressure on birds in protected sites. To make mitigation delivery more co-ordinated, efficient and effective, a joint and strategic approach, known as the Recreational disturbance Avoidance and Mitigation Strategy (RAMS) is being established by Ipswich Borough Council, in partnership with East Suffolk Council, Babergh District Council and Mid Suffolk District Council.

The draft Ipswich LCWIP does not impact on any of these measures.

Does this LCWIP need an additional appropriate assessment?

In supporting policies to manage active travel opportunities in Ipswich, there will not be significant impacts for the Stour and Orwell Estuary SPA and Ramsar site arising from the draft Ipswich LCWIP. Similarly, in relation to the identified sites which lie outside the Borough in neighbouring Districts, there will not be significant impacts.

It can therefore be concluded that there will be no further effects on European sites and that an appropriate assessment is not required.

Natural England have been consulted on this Screening Assessment. Their feedback will be reported in due course.

Date of determination: 20 December 2024