

Ipswich Borough Council Flood Risk Sequential Statement

Introduction

Ipswich Borough Council is producing a range of development plan documents (DPDs) in its Local Development Framework (LDF), which include:

- Core Strategy and Policies
- IP-One Area Action Plan
- Site Allocations and Policies

The Core Strategy and Policies DPD (hereinafter referred to as 'Core Strategy'), sets the strategic policy for the Borough of Ipswich until 2026. The two site-specific documents (hereinafter referred to as 'IP-One AAP' and 'Site Allocations DPD') allocate sites for development. In order to be able to allocate sites the Council has undertaken a Sequential Test to assess the level of flood risk present on each site and to steer development to sites at a lower risk of flooding where appropriate, while taking into account necessity to develop on previously developed land in areas of central Ipswich. There are limited brownfield sites available for development in Flood Zone 1 and taking into account the need for the regeneration of brownfield sites and to locate development in central locations to minimise carbon emissions and the need to travel, it is necessary to locate some development in Flood Zones 2 and 3a.

Strategic Housing Land Availability Assessment

The Strategic Housing Land Availability Assessment (March 2010) (hereinafter referred to as 'SHLAA') identified sites in the Borough that were suitable for housing, available and achievable within the plan period. Flood Zones 2 or 3 were identified as a constraint on development, however the purpose of the SHLAA is to identify likely deliverable timescales.

The SHLAA further appraised sites identified in the Preferred Options development plan documents to assess their suitability, availability and achievability.

The SHLAA identified in the Final Report (March 2010) in Annex H on pages 89-94, a theoretical capacity on developable sites without planning permission at the 1st April 2009 as:

IP-One Area Period 1 (Years 1-5):	623
IP-One Area Period 2 (Years 6-10):	1,472
Rest of Borough Period 1 (Years 1-5):	902
Rest of Borough Period 2 (Years 6-10):	493
Total	3,490

This is split between **2,095** dwellings in the IP-One area and **1,395** dwellings in the Rest of Borough.

In addition the SHLAA identified a theoretical capacity of 5,960 dwellings on sites in the Rest of the Borough for Period 2 (Years 6-10) and as part of broad location (Years 11-15). This includes a figure of **4,747** dwellings on the area identified in North Ipswich for future housing development on the Proposals Map in the submission version of the Core Strategy and Policies development plan document.

Potential Development Sites (IP references)

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

The Council has through its SHLAA (March, 2010), identified sites, which are capable of delivering residential development either wholly or as part of mixed-use development during the plan period to 2026. The SHLAA assesses the suitability, availability and achievability of sites indicating a likely delivery timescale. One of the constraints identified in the site analysis is whether a site is in Flood Zone 2 or 3. The SHLAA informed the Council's housing trajectory, which was published in its Annual Monitoring Report 6, 2009/10 (December, 2010) and identifies a housing land supply for 15 years (2011 to 2026) including the current monitoring period of 2010/11.

The housing trajectory identifies **1,732** dwellings in Flood Zone 1 that do not have planning permission and a further **2,500** dwellings on a large greenfield urban extension in Flood Zone 1. In Flood Zone 2 and 3, the housing trajectory identifies **1,504** dwellings without planning permission, all of which are on previously developed land.

Therefore, although the Council identifies sites in Flood Zone 1 for residential development through the Sequential Test, there is not enough land in this Flood Zone to meet the housing land requirement and a large proportion of it, 69%, is greenfield development. Furthermore the Core Strategy is an urban regeneration led plan, which focuses development in the centre of Ipswich. In doing so it follows on from the existing adopted strategy in the Local Plan. Therefore sites in Flood Zone 2 and 3 are required to meet the objectives of urban regeneration and sustainable development as well as meeting the previously developed land targets set of at least 60% of new housing in Planning Policy Statement 3 (June, 2010) and at least 70% of all development in the Council's Core Strategy policy CS9.

Sites identified in Flood Zone 1 without planning permission at 1st April 2010 are listed below:

Site Ref	Site Name	Rest of Borough (ROB) / IP-One, Greenfield (G), Brownfield (B)	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP005	Former Tooks Bakery, Old Norwich Road	ROB, B	2014-16	2.80	100
IP006	Co-op Warehouse, Paul's Road	IP-One, B	2017-18	0.63	28
IP007	Ranelagh School	IP-One, B	2016-17	0.69	18
IP009	Victoria Nurseries, Westerfield Road	ROB, B	2016-17	0.39	14
IP010a	Co-op Depot, Felixstowe Road	ROB, B	2013-16	3.88	110

IP010b	Felixstowe Road	ROB, B	2018-20	2.79	75
IP013	Hill House Road	ROB, B	2016-17	0.10	5
IP014	Orwell Church	IP-One, B	2017-18	0.21	23
IP016	Funeral Directors, Suffolk Road	ROB, B	2015-16	1.04	14
IP018	Deben Road	ROB, B	2019-20	0.36	16
IP020b	Water Tower, Park Road	ROB, B	2018-19	1.20	42
IP023a	Fire Station, Colchester Road	ROB, B	2015-16	1.21	47
IP023b	Former Builders' Yard (r/o Fire Station, Colchester Road)	ROB, B	2015-16	0.25	10
IP029	Land opposite 674-734 Bramford Road	ROB, G	2014-16	2.26	51
IP032	King George V Field, Old Norwich Road	ROB, G	2015-16	3.54	62
IP033	Land at Bramford Road (Stocks site)	ROB, B	2015-16	2.03	46
IP041	Civic Centre Area / Civic Drive	IP-One, B	2016-17	0.52	29
IP048	Mint Quarter	IP-One, B	2018-19	2.92	64
IP058	Raeburn Road South / Sandy Hill Lane	ROB, B	2016-18	5.85	102
IP065	Former 405 Club, Bader Close	ROB, G	2014-16	3.22	87
IP066	JJ Wilson, White Elm Street	ROB, B	2020-21	0.22	10
IP067	Former British Energy Site	ROB, B	2017-18	5.25	37
IP072	Cocksedge Engineering, Sandy Hill Lane	ROB, B	2019-20	0.63	22
IP073	Thomas Wolsey Special School, Old Norwich Road	ROB, B	2012-13	1.38	48
IP089	Waterworks Street	IP-One, B	2019-20	0.31	34
IP101	Rear of Stratford Road & Cedarcroft Road	ROB, B	2016-17	0.20	9
IP108	Builders Yard, Vermont Crescent	ROB, B	2019-20	0.20	7
IP112	2 & 4 Derby Road	ROB, B	2020-21	0.49	22
IP113	The Railway PH, Foxhall Road	ROB, B	2020-21	0.34	3
IP116	St Clement's Hospital Grounds	ROB, B	2013-16	4.88	146
IP116	St Clement's Hospital Grounds	ROB, G	2013-16	6.75	204
IP121	Front of pumping station, Belstead Road	ROB, G	2020-21	0.60	27
IP129	BT Depot, Woodbridge Road	ROB, B	2019-21	1.07	48
IP131	488-496 Woodbridge Road	ROB, B	2018-19	0.37	34
IP165	Eastway Business Park, Europa Way	ROB, B	2016-18	2.08	100
IP174	12 Tacket Street	IP-One, B	2016-17	0.04	14
IP215	7-15 Queen Street	IP-One, B	2016-17	0.09	12
IP221	Flying Horse PH, 4	ROB, B	2016-17	0.35	12

	Waterford Road				
	Total				1,732
	Brownfield Total			67%	1,301
	Greenfield Total			33%	431

If the Land west of Westerfield Road and south of railway line, plus the broad location identified in the housing trajectory are added in the amended totals are as follows:

	Land west of Westerfield Road and south of railway line	ROB, G	2016-21		1,000
	Broad Location	ROB, G	2021-26		1,500
	Total				2,500
	Grand Total (1,733 + 2,500)				4,232
	Brownfield Total			31%	1,301
	Greenfield Total			69%	2,931

Sites identified in Flood Zone 2 & 3a without planning permission are shown below. These pass the sequential test as it is demonstrated above, there are not enough sites available and developable within the plan period to meet the housing requirement on the Borough, unless sites are developed in Flood Zone 2 & 3a. These sites are taken from the SHLAA Final Report (March 2010) and informed by the published housing trajectory (November 2010). They do not include sites, which had received planning permission as at 1st April 2010. This table concurs with that shown in the Council's level 2 Strategic Flood Risk Assessment (SFRA).

Site Ref	Site Name	ROB/IP-One, B/G	Delivery	Site Size (ha)	Indicative Capacity (Homes)
IP003	Waste tip north of Sir Alf Ramsey Way	IP-One, B	2018-21	1.57	173
IP004	Bus depot, Sir Alf Ramsey Way	IP-One, B	2020-21	1.07	59
IP011b	Smart Street, Foundation Street	IP-One, B	2018-19	0.69	61
IP015	West End Road Surface Car Park	IP-One, B	2020-21	1.22	27
IP028a	Land West of Greyfriars Road	IP-One, B	2016-17	0.06	14
IP028b	Land West of Greyfriars Road (Jewsons)	IP-One, B	2019-20	0.97	21
IP031	Burrell Road	IP-One, B	2016-17	0.74	81
IP036b	Shed 7	IP-One, B	2016-17	0.79	65
IP037	Island Site	IP-One, B	2018-21	6.02	331
IP039	Land between Vernon Street & Stoke Quay	IP-One, B	2017-18	1.09	96
IP044	Land South of Mather Way	IP-One, B	2016-17	0.78	17
IP049	No 8 Shed, Orwell Quay	IP-One, B	2014-16	0.76	200

IP050	Land West of New Cut	IP-One, B	2016-17	0.46	25
IP054	Land between Old Cattle Market & Star Lane	IP-One, B	2016-18	1.71	94
IP080	240 Wherstead Road	IP-One, B	2013-14	0.49	26
IP081	Land North of Ranelagh Road	IP-One, B	2016-17	0.36	32
IP083	Banks of river, upriver from Princes Street	IP-One, B	2020-21	0.76	17
IP096	Car Park Handford Road East	IP-One, B	2015-16	0.22	10
IP098	Transco, south of Patteson Road	IP-One, B	2014-16	0.64	63
IP105	Depot, Beaconsfield Road	ROB, B	2020-21	0.34	15
IP120	Land West of West End Road	IP-One, B	2019-20	1.03	46
IP136	Silo, College Street	IP-One, B	2017-18	0.16	21
IP188	Websters Saleyard site, Dock Street	IP-One, B	2014-15	0.11	10
	Total				1,504

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

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