

# **Ipswich Borough Council Local Development Framework**

## **Environment Assessment of Plans and Programmes Regulations 2004**

### **Ipswich Borough Council Core Strategy and Policies Development Plan Document and Proposals Map Sustainability Appraisal and Strategic Environmental Assessment Adoption Statement**

#### **Introduction**

Ipswich Borough Council adopted its Core Strategy and Policies Development Plan Document (DPD) and Proposals Map at its Council meeting on 14<sup>th</sup> December 2011.

This Sustainability Appraisal and Strategic Environmental Assessment Adoption Statement has been prepared in accordance with Section 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004, which requires local planning authorities to demonstrate:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed and results of public consultation have been taken into account;
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

The Core Strategy and Policies DPD (the 'Core Strategy') will form part of the Ipswich Borough Council Local Development Framework and will replace relevant parts of the existing Ipswich Local Plan 1997. The Core Strategy is the principal document of the Local Development Framework and has the key role of setting the vision, spatial strategy and core policies for development in the Borough for the period up to 2027.

The Core Strategy is the first Development Plan Document to be adopted by the Council and all subsequent documents in the Local Development Framework must be in conformity with it.

The Core Strategy was considered by an independent Planning Inspector at an Examination in Public, which included Hearings held in May and July 2011. The Inspector's Report was published on the Council's website on 24<sup>th</sup> November 2011.

#### **How does the Sustainability Appraisal relate to the Core Strategy?**

In accordance with Section 19 (5) of the Planning and Compulsory Purchase Act 2004, local planning authorities are required to carry out an appraisal of the sustainability of the proposals contained in plans and programmes, such as a development plan document, and prepare a report setting out these findings. Government guidance contained in 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (ODPM 2005) also clarifies that in accordance with the Environmental Assessment Regulations for Plans and Programmes, a Sustainability Appraisal should incorporate Strategic Environmental Assessment as required by Article 13.3 of the European Directive 2001/42/EC (SEA

Directive). The Sustainability Appraisal highlights where the requirements of the SEA Directive have been met.

A Sustainability Appraisal is an assessment of the possible economic, environmental and social effects of a plan undertaken from the outset of the preparation process to allow decisions to be made that accord with sustainable development. Therefore, the Sustainability Appraisal was used to evaluate the various reasonable policy alternatives and consider the likely implications for sustainable development of the Core Strategy throughout its preparation.

The SEA Directive requires local planning authorities to carry out formal Strategic Environmental Assessment of certain plans and programmes which are likely to have significant effects on the environment. The Strategic Environmental Assessment process ensures that opportunities for public involvement are provided and the significant environmental effects arising from policies, plans and programmes are predicted, evaluated, mitigated and monitored.

### **How the environmental considerations have been integrated into the Core Strategy**

The Sustainability Appraisal of the Ipswich Borough Council Core Strategy and Policies development plan document has been an iterative process carried out for each key stage of the document, including issues and options, preferred options and submission stages.

The Sustainability Appraisal commenced during the pre-production and evidence gathering stage. In 2005 the Council started to develop a Sustainability Appraisal and Strategic Environmental Assessment Framework. Consultation was carried out on objectives and indicators for the Strategic Environmental Assessment and responses were received from organisations including Natural England, English Heritage, the Environment Agency, two neighbouring parish councils and businesses. The work was developed further into a Scoping Report, which was published in March 2006 for public consultation. It detailed:

- the sustainability appraisal framework;
- a review of related plans and programmes;
- social, economic and environmental baseline data;
- identification of the current social, economic and environmental situation in the Borough; and
- the methodology.

The draft Scoping Report was issued to selected bodies including English Heritage, the Environment Agency, Natural England and the Countryside Agency for consultation. The comments received were reported to the Council's Executive on 1<sup>st</sup> August 2006 (Appendix 3 to the Executive report reference E/06/32 or see link [http://www.ipswich.gov.uk/downloads/Aug\\_2006\\_regional\\_planning\\_and\\_local\\_development\\_framework\\_issues\\_inc\\_appendices.pdf](http://www.ipswich.gov.uk/downloads/Aug_2006_regional_planning_and_local_development_framework_issues_inc_appendices.pdf)). Thus key environmental agencies had the opportunity to influence the sustainability objectives used for the sustainability appraisal. As a further check on the Scoping Report work, environmental consultancy TRL carried out a verification exercise in June 2006 and concluded that the process to that point had been carried out in accordance with the legislative requirements (see Appendix 4 to the above Executive Report).

From Preferred Options stage onwards, Suffolk County Council undertook the Sustainability Appraisal work for Ipswich Borough Council.

At each stage in the preparation of the Core Strategy, options have been tested against the Sustainability Appraisal Framework to predict and evaluate the effects of the Core Strategy in terms of mitigating adverse effects and maximising beneficial effects.

Environmental considerations are now strongly interwoven into the plan policies. As a result of every policy being tested for its environmental integrity, amendments have been made to policies as they have been refined to maximise their effectiveness in achieving the environmental objectives set in the Sustainability Appraisal. In the Addendum to the Sustainability Appraisal published in September 2009, paragraph 2.2.4 refers to and Table 7.1 summarises changes made to the Core Strategy, including as a result of the sustainability appraisal process.

### **How the Sustainability Appraisal has been taken into account at each stage of Core Strategy preparation.**

#### **Issues and Options**

The Issues and Options documents for the Core Strategy and Policies DPD and the Requirements for Residential Developments DPD (which was subsequently incorporated into the Core Strategy) presented a number of options and reasonable alternatives for the spatial strategy. They included options for housing delivery, employment growth and regeneration and meeting the different housing needs of local people. The Issues and Options were appraised using the Sustainability Appraisal objectives developed during the Scoping stage of Sustainability Appraisal production described above. The resulting information was used to inform the preparation of the preferred options report (reported in Appendix 1 to the Preferred Options Sustainability Appraisal November 2007).

The Issues and Options Sustainability Appraisal enabled the social, economic and environmental acceptability of potential options for development to be ascertained. This identified a number of potential effects associated with the various options proposed, both positive and negative. The Issues and Options appraisal was a tool for decision making. It highlighted sustainability issues rather than recommending appropriate options for implementation.

#### **Preferred Options**

A Sustainability Appraisal was produced alongside the Preferred Options for the Core Strategy and Policies DPD and subject to public consultation between January and March 2008. The Preferred Options draft of the Core Strategy and Policies DPD set out the Borough Council's preferred approach regarding future development in the Borough and included a number of potential policy areas to help deliver this approach.

The potential effects of the Preferred Options were appraised against the Sustainability Appraisal Framework, which provided information on their possible economic, social and environmental impacts. The appraisal considered whether the impact would be expected to be positive, negative, neutral or both positive and negative. Where a potentially negative impact was identified, mitigation measures were proposed where possible. An appraisal matrix was produced for each 'Policy Area' contained within the Preferred Options Core Strategy. Chapter 10 of the Sustainability Appraisal of the Preferred Options November 2007 sets out recommendations. Recommendation 2, for example, refers to the requirement in

Policy Area 34 to requiring travel plans for major developments and advises that a definition be provided. Policy DC15 in the draft submission version provided this definition.

### **Publication/Submission Draft**

A Sustainability Appraisal was submitted alongside the Core Strategy and Policies DPD in March 2010, following consultation on the submission draft between October and December 2009. Each policy was assessed against the Sustainability Appraisal objectives. An evaluation was again completed of the potential cumulative effects that could result from implementation of the policies (see for example paragraph 8.4 of the in Sustainability Appraisal August 2009). Again, in the Addendum to the Sustainability Appraisal published in September 2009, paragraph 2.2.4 refers to and Table 7.1 summarises changes made to the Core Strategy, including as a result of the sustainability appraisal process.

### **Post-Submission Stage**

Following submission of the Core Strategy, amendments were proposed to the plan in the form of Focused and Minor Changes (November 2010) in response to the revocation (at the time) of Regional Spatial Strategy, and changes arising from the Examination Hearings. Amendments were subject to sustainability appraisal to check that they were not likely to have negative effects, and the sustainability appraisal carried out was itself subject to public consultation. Representations received were considered by the Inspector.

### **The Sustainability Appraisal consultation process and how opinions have been taken into account**

#### **Scoping report**

Article 5.4 of the Strategic Environmental Assessment Directive requires consultation with authorities with environmental responsibilities when deciding the scope and level of detail of the information which must be included in the environmental report (that is, the Sustainability Appraisal). The required consultees are the Environment Agency, English Heritage and Natural England (which incorporates the now defunct Countryside Agency). These and additional key stakeholder organisations were invited to comment on the Ipswich Sustainability Appraisal objectives and indicators in May and June 2005. Responses were also sought from a range of other consultees such as neighbouring parish councils, in order to ensure a wider picture of social and economic sustainability as well as environmental sustainability.

Details of those consulted at this stage, their comments and the Council's responses thereto are set out in Appendix 3 of the report to Executive on 1<sup>st</sup> August 2006 (reference E/06/32 entitled Regional Planning and Local Development Framework Issues).

#### **Draft Sustainability Appraisal**

The draft Sustainability Appraisal report and associated technical appendices were issued for consultation at each formal stage of Core Strategy production to those statutory bodies with responsibility for environmental issues, as well as to other appropriate consultees with an interest in social and economic issues. Comments were taken into account alongside responses to the Core Strategy as a whole in work to develop the next stage of the Core Strategy.

## **Proposed Submission Consultation**

The Updated Sustainability Appraisal including Addendum was published alongside the Proposed Submission publication Core Strategy for consultation in October 2009. This was the key output of the Sustainability Appraisal process as it presented the evolution of the Sustainability Appraisal and illustrated how its findings informed the development of the Core Strategy. The response to previous comments made on the Sustainability Appraisal was reported to Council on 9<sup>th</sup> September 2009 (Appendix 7 to report reference C/09/05 [http://www.ipswich.gov.uk/downloads/C-09-05\\_Appendix\\_7.pdf](http://www.ipswich.gov.uk/downloads/C-09-05_Appendix_7.pdf)). Some of these comments were updating information available and could be taken on board in the updated appraisal report, others were opinions on the appraisal that could not always be accommodated, however they were noted. Paragraph 6.5 of the Sustainability Appraisal August 2009 refers. The report also encompassed the requirements of the SEA Directive. Therefore, the Sustainability Appraisal was a key tenet of the evidence base underpinning the Core Strategy and was used to assess the 'soundness' of the plan during Examination.

## **Reasons for choosing the plan as adopted in the light of other reasonable alternatives**

The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) (b) requires that the SA/SEA evaluates reasonable alternatives, taking into account the scope and objectives of the plan.

There are two ways in which reasonable options have been considered by the Council in the preparation of the Core Strategy. The first was through the stages of plan preparation, each of which was subject to sustainability appraisal. Two fundamental choices on the spatial strategy have been considered through the plan preparation process: first at Preferred Options stage a spatial strategy of urban concentration with no development at the Northern Fringe of Ipswich, and secondly at Submission stage a spatial strategy still focusing on urban regeneration but allowing some development to start at the Northern Fringe in the latter part of the Plan period.

The results of the consultation process at Preferred Options stage were clear that a strategy which excluded the land at the Northern Fringe could not be delivered. The responses received were that a number of owners were unwilling to put forward their urban brownfield sites for development and this information was incorporated into the Draft Strategic Housing Land Availability Assessment at September 2009 and as updated in March 2010 (core document references ICD 34 and ACD14 <http://www.ipswich.gov.uk/coredocumentlibrary>). Therefore there was insufficient previously developed urban land available to accommodate the growth required by the East of England Plan. Thus the Council considered that in order to be in general conformity with the East of England Plan (a statutory requirement), some development at the Northern Fringe could not be avoided. This was the Strategy sustainability appraised at the Submission stage. The housing growth policy CS7 was the only policy to score negatively in the Sustainability Appraisal as explained in paragraph 7.2.4 of the Sustainability Appraisal Report August 2009, due to the scale of growth required by the Regional Spatial Strategy and the potential for impacts on soil quality and resources, biodiversity and geodiversity, landscapes and townscapes, energy use, archaeology and flood risk.

The Council therefore considers that reasonable alternatives have been considered and that the submitted Core Strategy was the only viable strategy which would be

both in general conformity with a pro-growth Regional Spatial Strategy, and capable of delivery in an urban borough with a tightly drawn boundary.

The second way in which reasonable alternatives were considered was through the Submission stage Sustainability Appraisal report comparing the proposed strategy with a non-implementation or 'do nothing' alternative. Only one policy was out-scored by the alternative and this again was Policy CS7 outlining the housing target, because the policy reflected regional and national growth targets (see paragraph 1.1.4 of the Sustainability Report August 2009).

### **Measures to be taken to monitor the significant environmental effects of implementation of the plan**

The Sustainability Appraisal is an iterative process. The success and effectiveness of the Core Strategy will need to be monitored to ensure any unforeseen adverse effects are identified and acted upon. The Sustainability Appraisal suggests a range of targets and indicators to enable appropriate monitoring of the Core Strategy. Some are already Core Strategy indicators, such as congestion and carbon dioxide reduction (see section 11 of the Sustainability Appraisal August 2009).

The suggested targets and indicators are designed to be used as guidance only, as depending on how they are implemented they may require some future refinement. Information on monitoring and implementation of the Core Strategy Development Plan Document will be contained within the Annual Monitoring Report.

### **Inspection of documents:**

Copies of the adopted Core Strategy and Policies DPD and Proposals Map, the adoption statement, the Sustainability Appraisal and Strategic Environmental Assessment adoption statement, and Sustainability Appraisal report are available for public inspection at the locations set out below and on the Council's website [www.ipswich.gov.uk](http://www.ipswich.gov.uk).

- **Customer Service Centre**, Town Hall, Cornhill, Ipswich (weekdays 8.30am to 5.30pm)
- **Ipswich County Library**, Northgate Street, Ipswich (Mon, Weds, Thurs 9am to 6pm; Tues, Fri 9am to 7pm; Saturdays 8.30am to 5pm and Sundays 10am to 4pm)
- **Branch libraries** across Ipswich (Chantry, Gainsborough open Mon-Sun various opening hours; Rosehill, Stoke, Westbourne open Tues-Sun various opening hours)
- **Tourist Information Centre**, St Stephen's Church, St Stephen's Lane, Ipswich (Mon-Sat 9am-5pm)
- **Grafton House Reception**, 15-17 Russell Road, Ipswich (Mon-Fri 8.30am to 5pm).

Please note that the opening hours at these locations may vary over the festive period.

Mike Tee,  
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21<sup>st</sup> December 2011