

# Final Draft Ipswich Local Plan Review

## Ipswich Borough Council Response to the Habitat Regulations Assessment Addendum

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**IPSWICH**  
BOROUGH COUNCIL

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## **Introduction**

- 1.1 Ipswich Borough Council commissioned Footprint Ecology to produce an addendum to the Habitats Regulation Assessment (HRA) of the Ipswich Local Plan Review at Final Draft stage in response to two additional pieces of evidence:
  - The aligned local plans for Suffolk Districts Air Quality Assessment, report for Suffolk County Council & Ipswich Borough Council, WSP (2020).
  - Strategic Flood Risk Assessment, AECOM (2020).
- 1.2 The HRA finalised in January 2020 checked all aspects of the emerging Local Plan Review for risks to European sites and concluded that at a plan level the emerging Local Plan Review would not result in adverse effects on European site integrity.
- 1.3 The purpose of the addendum was to review the two further pieces of evidence and check whether they affected the conclusions of the HRA prepared on January 2020.

## **Strategic Flood Risk Assessment (SFRA)**

- 2.1 The updated SFRA collates relevant and up to date information on the risk of flooding to the Borough from all sources.
- 2.2 The HRA finalised in January 2020 ruled out adverse effects on integrity from flood risk. It highlighted the Development and Flood Risk SPD (most recently updated in 2016) and Core Strategy Policy CS18, which commits to the implementation of the Borough's Flood Defense Management Strategy, along with Policy DM4 that requires adherence to this strategy and sets out clear requirements for flood risk prevention in development proposals.
- 2.3 The HRA addendum concluded that the updated SFRA was a positive step to reducing the risks identified in the HRA finalised in January 2020 as it provided evidence to ensure impacts from run-off could be avoided and set out guidance for SUDS in order to reduce and manage surface water run-off from developments and also sets out strategic flood risk management measures.
- 2.4 The new information in the SFRA enabled Footprint to conclude that the original HRA conclusions of no adverse effects on the integrity of the Stour and Orwell Estuaries SPA/Ramsar remains.
- 2.5 At previous stages in the Local Plan process the HRA has advised policy wording changes to ensure the Local Plan would not lead to any adverse effects on European wildlife sites within the vicinity of Ipswich Borough. The HRA addendum has not recommended any such changes and therefore the Council has no plans to amend the Local Plan.

## **The aligned local plans for Suffolk Districts Air Quality Assessment, report for Suffolk County Council & Ipswich Borough Council**

- 3.1 The Air Quality Assessment considers the potential impact on nutrient nitrogen levels of the emerging Ipswich local Plan Review without and with Transport Mitigation Measures.
- 3.2 The HRA finalised in January 2020 drew on case law, best practice guidance, discussion with Natural England and reference to traffic modelling to conclude, for air quality, that there were potential risks that warranted a coordinated approach to more comprehensive evidence gathering, but that this should be planned in time for the next plan review. Overall, the HRA concluded no adverse effect on site integrity.
- 3.3 The new air quality evidence shows a trajectory of steady improvement in NO<sub>x</sub> and Nitrogen deposition, and the emerging Ipswich Local Plan Review is not predicted to influence that trajectory. With the inclusion of transport mitigation, the results indicate that adverse effects on integrity of the Stour and Orwell Estuaries SPA/Ramsar can be ruled out, alone and in-combination with the other local plans in the Ipswich Strategic Planning Area. This confirms the conclusions of the previous HRA work.
- 3.4 The conclusions of the HRA addendum with respect to air quality are welcomed. Given the positive implications of the new evidence the Borough Council has no plans to amend the Final Draft Ipswich Local Plan Review.