

## **Ipswich Borough Council Draft Development and Flood Risk Supplementary Planning Document (SPD)**

### **Consultation Statement for the Draft Development and Flood Risk SPD, July 2021**

#### **Introduction**

In 2013, Ipswich Borough Council adopted a Development and Flood Risk Supplementary Planning Document ('SPD'). It set out an approach to assessing the safety of proposed developments within the flood zone (the 'safety framework'), based on Environment Agency hazard mapping and data contained in the Ipswich Strategic Flood Risk Assessment, 2011. The SPD was updated in 2016.

The Council published a new Strategic Flood Risk Assessment in October 2020. It updates the 2011 document by reflecting the completion of the Ipswich tidal barrier in 2019, the Environment Agency's new Gipping Model published in 2020, and updated national climate change forecasts. Therefore, a new iteration of the Development and Flood Risk SPD has been prepared to take account of the new information and to reflect updated National Planning Policy and Guidance, February 2019. The draft SPD is being developed in collaboration with the Environment Agency, Ipswich and Suffolk Joint Emergency Planning Unit, Suffolk County Council Flood and Water Management Team, and Anglian Water.

#### **Call for Ideas**

The Ipswich Statement of community Involvement 2018 (updated November 2020) states that the, 'Council will consult organisations and the local community as appropriate to the topic, seeking views on the content. The Council will do this through e-mail.' The call for ideas for this document has been conducted in an informal and targeted way, reflecting the specific responsibilities organisations have in relation to flood risk, and the fact that this is an update which will replace the existing Development and Flood Risk SPD.

Therefore, the following organisations were invited by email to comment informally on an initial draft of the Development and Flood Risk SPD between 9<sup>th</sup> and 30<sup>th</sup> April 2021:

- The Environment Agency - the Environment Agency has a strategic overview of all sources of flooding and coastal erosion (as defined in the Flood and Water Management Act 2010);
- Suffolk County Council as Lead Local Flood Authority - Suffolk County Council has responsibility for managing the risk of flooding from surface water, ground water and 'Ordinary Water Courses'; and
- Ipswich and Suffolk Joint Emergency Planning Unit, which is a member of the Suffolk Resilience Forum.

Comments were also invited (and received) from Anglian Water in June 2021, as the organisation with responsibility for foul and surface water drainage systems.

The comments received during the specialist Call for Ideas consultation are shown below, together with the Council's response. Discussion was ongoing over a period of time and the comments and responses below encapsulate final positions reached during this informal stage of engagement. All respondents are thanked for their constructive comments on the scope and content of the SPD. The draft Development and Flood Risk SPD has been edited to respond to the respondents' comments as indicated.

<b>Respondent</b>	<b>Part of Draft SPD</b>	<b>Specialist Call for Ideas comments received, April-June 2021</b>	<b>IBC Response</b>
Joint Emergency Planning Unit	General	The Joint Emergency Planning Unit (JEPU) is providing this feedback for the sole purpose of providing outline commentary on the SPD in relation to the Strategic Flood Risk Assessment (SFRA). The SPD is the sole responsibility of the Ipswich Borough Council and JEPU does not endorse any specific SPD and cannot accept responsibility for any omission or error contained in any such SPD, or for any loss damage or inconvenience which may result from the approval of a development where the SPD was used as guidance.	Noted and no amendments made.
Joint Emergency Planning Unit	Section 9	Re: The information in section 9 of the SPD compared to the information provided in SFRA.  The overall information is good and the main safety points have been conveyed well in the SPD. There is more detail in the SFRA but lots of references have been made to SFRA Oct 2020 if anyone wishes to view that document in conjunction with the SPD.	Noted and no further mapping or content from the SFRA has been copied across to the SPD.
Joint Emergency Planning Unit	Section 9	An important note for developers from SFRA 7.1 paragraph 2 is important to reference in section 9 of SPD specifically the part about 'new development should not increase the burden on the Emergency Services or expose them to hazardous flooding when attempting to assist users of new developments'. Reference to the ADEPT/EA guidance where this statement was used in SFRA is used in section 9.2.52 in the SPD and may be an appropriate place for this to be added?	The sentence from SFRA para 7.1 has been copied across to the SPD para 9.2.56.
Joint Emergency Planning Unit	9.2	In SPD section 9.2.51 (title Flood Management Plans) would it be worth referencing a suggested structure for Flood Management Plans can be found in SFRA section 7.3.6?	This has not been added to the SPD because the structure for FMPs is reproduced in the SPD's Appendix 6

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			for ease of reference.
Joint Emergency Planning Unit	General	JEPU is happy with the amount of mapping that has been duplicated as this helps developers understand the affected areas under various circumstances and all mapping has been referenced in what it is showing.	The Council agrees that the balance between including mapping and cross referring to the SFRA is appropriate.
Joint Emergency Planning Unit	9.2.45	In recommending flood warning and evacuation as an approach, the capacity of emergency rest centres needs to be taken into account. The number of residents expected to occupy a building should be provided to the JEPU for the planning of rest centre provision.	Requirement added to 9.2.45
Environment Agency	1.2.4	Refer to vulnerable forms of development (given that some types of less vulnerable development do not need the application of the Exception Test)	Text amended to reflect this.
Environment Agency	Flood Mitigation Strategy	In the flow chart, 'Avoid' should be Apply the ST; Substitute 'should apply the sequential approach at site level'?  Also, the linear aspect of this diagram is a little constraining. There would most likely be an initial assessment to inform the ST, but more detail (the FRA proper) at the later stage to inform what goes where and control/mitigation on site. 'Avoid' is the first key action?	The diagram was based on Table 7 of the Local Plan. It has been amended and simplified to align with the diagram in section 2.1 of the SFRA and Table 10-2 of the SFRA.
Environment Agency	1.3.1	The Flood Map for Planning only shows background flood risk from tidal and fluvial sources, not from Surface Water or Groundwater.  The EA does produce a web-based map called "The Risk of Flooding from Surface Water" map as a separate mapping output on the gov.uk website. It may be worth mentioning this as a separate bullet point (perhaps just below the Flood Map for Planning and above the Ipswich SWMP bullets?)	Additional bullet added.
Environment Agency	1.3.1	This should read 'foul' drainage not sewerage drainage	Appropriate bullet changed.

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Environment Agency	General	Flood zones are usually '3a' and '3b', rather than 3A & 3B. 3a & 3b are used elsewhere in this document	References checked and changed where necessary throughout.
Environment Agency	2.1.3	FZ3b is designated by the LPA through its SFRA i.e. unlike the rest of the flood zones, it is not designated by the EA.	Explanation added.
Environment Agency	2.2.3	Information requested from EA to provide the same context for the extreme 0.1% AEP (1 in 1000 annual chance) event for tidal – and subsequently provided.	Information incorporated in 2.2.3-2.2.5 from the EA.
Environment Agency	2.2.4	Suggest re-ordering with the start of this stating what a design flood is (and its importance in context of mitigations) and making reference that the Design flood (in the context of tidal flooding) is the 0.5% AEP event occurring over the development's lifetime.	Order changed as requested and reference to additional information regarding design flood.
Environment Agency	2.3.2	Change annual chance event references regarding the River Gipping Modelling.	Changed appropriately in the paragraph.
Environment Agency	2.3.6	Mention whether (and how) fluvial flood risk would need to be assessed even though it is not modelled?	Paragraph changed to reflect that future development in the Mill River floodplain would require modelling.
Environment Agency	3.1.2	It would be useful to include the website references for sequential and exception tests	Inserted.
Environment Agency	3.1.4	Add 'Vulnerable forms' of development	Inserted.
Environment Agency	3.2.1	The reference to both IBC and EA pre-application services being charged for, is partly correct but is missing the distinction that we may also offer initial preliminary opinions which would be free of charge. The link underneath this paragraph is in fact the correct link to the preliminary opinion request form, within the wording it directs applicants to the additional service we may be able to provide for more bespoke advice.	Suggested text accepted
Environment Agency	3.2.1	Suggest you add appropriate website references to bullets	Accepted and links added.

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Environment Agency	3.2.4	Is it worth adding the Ipswich Surface Water Management Plan to the list above as developers may need to seek bespoke advice if their proposed development is located within a CDA identified by the SWMP?	Suggested wording added.
Environment Agency	3.2.5	Refer to "Risk Management Authorities" as bodies identified by Floods and Water Management Act 2010.	Accepted and references updated.
Environment Agency	3.2.5	There are currently no designated Areas with critical drainage problems across East Anglia (East) area. This point could be amended to say that there are no such areas within the IBC area?	Accepted and amended.
Environment Agency	5.1.2	Weblink to the sequential test would be useful in Chapter 5	Web link added to the Planning Practice Guidance.
Environment Agency	5.2.4	Could again include the link to Table 3 of the NPPG, showing vulnerability & flood zone compatibility?	Para 5.2.4 has been cross-referenced with the SPD Appendices where it is referred to.
Environment Agency	5.3.10	Should include reference to the wider sustainability benefits that outweigh the flood risk (part of the ET).	Added.
Environment Agency	7.1.1	Weblink to guidance on preparing flood risk assessment should be added.	Added
Environment Agency	8.1.3	Check wording is consistent with the PPG's FRA checklist.	Wording checked and confirmed. No change.
Environment Agency	Table 8.2	"Close to flood defence walls" might be better. Breach modelling would help to inform both structural and non-structural measures to bring about safe development. If rapid and highly hazardous characteristics, then design of the development might need to reflect this, whereas if onset of flooding to a site is over a longer period and transition from low hazard to a higher hazard is longer then there can perhaps be more reliance on non-structural measures to facilitate safety i.e. evacuation and flood response plans and less chance of being "caught out" by the flooding. It would need to be used to check that the structure of the building was capable of withstanding	Text added referring to development close to flood defence walls as well as adjoining. Clarification also added to Table 8-2 about the approach to ground floor sleeping accommodation in developments adjoining or close to flood walls, following further discussion.

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		hydrostatic and hydrodynamic forces of floodwater where positioned close to defence walls and structures that are effectively acting as dams. FRAs for development adjoining defences should also focus on how the development itself will not affect the integrity of the flood defence (or potentially modify a flood flowpath to the detriment of others)	
Environment Agency	9.1.2	Characteristics of flood event referred to in bullet point 1 need to link to breach flooding.	Appropriate cross-reference added (now bullet 3).
Environment Agency	9.1.7	Reference to breach in flood infrastructure	Appropriate cross-reference added.
Environment Agency	9.2.8	Need to consider what needs to be advised for self-contained ground floor flats as these will not have sleeping accommodation above breach level. There is a similar issue for bungalows or single storey developments. Is it the intention to preclude these types of development from areas assessed to be at residual risk of tidal flooding and in the case of flats, replace ground floor accommodation with car parking or less vulnerable forms of development?	Appropriate changes made as this is the intention.
Environment Agency	9.2.13	Please note: These are the “undefended” levels as the Flood Zones are drawn up to show land that is at risk of flooding for the given chance of flooding without the mitigating effects of flood defences.	Added. Need to retain this para as there could be sites in FZ2 or FZ1 that in 100 years’ time with climate change would flood. Therefore, they would not be safe.
Environment Agency	9.2.17	‘..the FRA should detail how the design makes the car park safe.’ This is particularly important for areas behind raised flood defences where flood hazard and rapidity of inundation would be extreme should the defences fail when loaded.	Emphasis has been added to this point.
Environment Agency	9.2.24	Add “Deep or hazardous flooding with rapid speed of onset”	Amended accordingly.
Environment Agency	9.2.28	The provision of refuge as a measure of safety for future occupants taking account of direct or residual risks for extreme flooding need to link to the need for a	Text added. FRP's are dealt with in later chapter.

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		Flood Response Plan (to provide essential advice to future users of what they should do should un-warned for flooding start to affect the site (or its surrounds).	
Environment Agency	9.2.30	Structural safety of buildings is an important consideration.	Appropriate text added.
Environment Agency	9.2.40	While a flood warning & evacuation plan is essential to inform development accommodating transient occupants, they are important for any development where a specific action is required to keep safe.	Appropriate text added.
Environment Agency	9.2.40	<p>It is important that Flood Warning and Evacuation Plans are developed for sites at risk of flooding, where there is the potential need to evacuate in advance of an extreme flood or to take action to keep safe in the event of the occurrence of flooding with no pre-warning (such as that which could occur should a flood defence breach. The Plan needs to make clear the steps that the occupants of a building need to take to keep themselves safe in such circumstances and the plan should make use of information from the Flood Risk Assessment to inform the occupants of circumstances where and how they should take refuge, the likely duration and other circumstances (pre-warning of an extreme flood) where they should be prepared to evacuate to a rest centre if advised to do so by the emergency services (the plan should show where the nearest rest centre is located). It would be worth making reference to the recent ADEPT guidance on the preparation of Emergency Flood Response Plans:-</p> <p><a href="https://www.adeptnet.org.uk/floodriskemergencyplan">https://www.adeptnet.org.uk/floodriskemergencyplan</a></p>	Relevant text added in new paragraph 9.2.41 Emergency Flood Response Plans dealt with in 9.2.52
Environment Agency	9.2.42	There may be a need to ensure that Flood Warning and Evacuation Plans are transferable if properties are sold over their lifetime. Developers can register the plans as a Land Charge so that they come up in legal property searches. The Plan could form part of the documents linked to the property deeds.	Text added
Environment Agency	9.2.44	Consider stating that applications for developments within flood risk areas that don't provide these up front as supporting evidence of non-structural measures	Text added

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		<p>designed to help satisfy the second part of the Exception Test, are likely to be refused. Where refuge is the key measure for keeping safe in extreme circumstances it is important that occupants know that this is the primary action that they need to take and that the development is designed to be safe for them with refuge at that level.</p>	
Environment Agency	9.2.45	<p>Advise a strategy of primarily evacuation linked to flood warning, but you will need to take opinions from Emergency Planning as to whether there is rest centre capacity to support this.</p> <p>I think it would always be prudent to ensure that any development built in an area that could be subject to hazardous flooding is built with fall back provisions to assist occupants in keeping safe, especially as we know that people will not always choose to evacuate, or that there may be circumstances where raised defences fail with no fore-warning of flooding and limited response time. This is an issue for fluvial risk as well given that the old tidal defences between Stoke Bridge and the London/Handford Road areas will provide management of fluvial water levels significantly above the surrounding ground levels during floodflow events. There are also raised fluvial defences upstream of Horseshoe Sluice in the Yarmouth Road area which retain elevated water levels in the river channel at a height that exceeds the surrounding land. Failure of those defences would see the need for persons to seek refuge within their dwellings.</p>	<p>This has also been discussed with the JEPU who requested the addition of a reference to the capacity of rest centres to accommodate those evacuated.</p> <p>Text added to address these points.</p>
Environment Agency	9.2.47	<p>New developments post 2012 are also not counted within the benefits formula for Flood Defence Grant-in-Aid, so it is essential that developers provide development designs that help to manage the impacts of future flooding to their buildings and to the safety of the future occupants. Defence enhancements are not a "given" and are dependent upon affordability (Eligible Flood Defence Grant-in-Aid and Local Partnership funding contributions)</p> <p><a href="https://assets.publishing.service.gov.uk/go">https://assets.publishing.service.gov.uk/go</a></p>	<p>2012 cut-off date does not work well for a regeneration area like Ipswich, which has seen significant growth since 2012 and has relatively low land values. However, the wording of the paragraph covers</p>

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		vernment/uploads/system/uploads/attachment_data/file/182524/flood-coastal-resilience-intro-guide.pdf Gov Policy statement - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221094/pb13896-flood-coastal-resilience-policy.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221094/pb13896-flood-coastal-resilience-policy.pdf</a>	the point that funded improvements to the defences cannot be relied upon. Text amendments retained.
Environment Agency	9.2.49	This needs to be determined by the Suffolk Resilience Forum and Emergency Planning, based upon their capabilities and the resources available to organise evacuations and capacity of facilities (Rest Centres) to cater for those evacuated. Given the fact that no-one can be forced to evacuate their dwelling (and recent events show that they may refuse to leave) this should be seen as a residual risk and developers should recognise this and ensure that building provide fallback arrangements to ensure that residents can stay safe in-situ.	Mirrored the approach for fluvial flooding because there should be warning of an extreme event. Checked with JEPU and reference to capacity has been added, plus reference below to developers providing occupancy estimates of developments.
Environment Agency	9.2.51	Information regarding the EA's operational strategy for the flood defences has been provided from our Flood Resilience team who are charged with administering and evolving the flood warning system for the town.	Wording about the operation of defences confirming that contingency is in place has been inserted as provided from EA.
Environment Agency	9.2.52	A flood warning, response and evacuation plan, prepared by the developer and agreed by the LPA taking advice from the EA and emergency planners/responders prior to the award of planning permission is essential in this context.	Text added
Environment Agency	9.2.52	Adequacy of FRA's must be agreed prior to the award of planning permission if the plan is an integral piece of evidence base to help inform the Exception Test.	Agreed – text added.
Environment Agency	9.2.57	Glad to see ADEPT/EA guidance referred to.	Noted.
Environment Agency	9.3.2	"the design flood" 1 in 100 year (1% AEP) plus climate change flood event.	Clarified in the text.
Environment Agency	9.5.2	EA would support/look for ecological enhancements, perhaps as part of demonstrating biodiversity net gain.	Agreed, text added and links to

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		Amenity & recreation improvements could also be incorporated. Is there a Local Plan policy that this line could link to? I'd like developers to be given more of a steer on this, so links to policy and/or further guidance would be useful.	emerging policies DM8 Natural Environment and DM10 Green Corridors (adopted policies DM31 and DM33).
Environment Agency	9.5.6	EA would also look for any existing features (ditches, ponds etc.) to be retained on site, and enhanced wherever possible.	Added.
Environment Agency	9.5.8	1% AEP "design flood" event	Added reference to design flood.
Environment Agency	9.5.9	Change in building footprint must ensure that it does not impact upon the ability of the floodplain to store water or alter flood flow paths that would give rise to higher flood hazard in off-site developed areas	Added.
Environment Agency	9.5.11 & 9.5.17	Add "design flood level"	Added.
Environment Agency	10.3.4	It may be useful to provide weblinks to this guidance on gov.uk: <a href="https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants">https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants</a> And the PPG: <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change#The-Exception-Test-section">https://www.gov.uk/guidance/flood-risk-and-coastal-change#The-Exception-Test-section</a>	Added
Environment Agency	Appendix 4, Table 3-1	Other forms of Environmental permit are generally required for waste storage, use, treatment and disposal. For activities that may occur in facilities which carry out industrial processes like refineries, food and drink factories and intensive farming activities, radioactive substances regulation and waste water discharges	Added reference to other forms of permit potentially being required (column 3).
Environment Agency	Appendix 5, Table 8-1 section 2	Lifetimes are still valid for residential development and flood risk.	Text on development lifetimes retained.
Environment Agency	Appendix 5 Table 8-1 section 2	Flood paths are still relevant as it is specifically talking about surface water flood paths, appropriate to remain under SW management section	Text on flood paths retained.
Flood and Water Management SCC	1.3.1	EA with LLFA's develop Flood Risk Management Plans (FRMP) We are currently working with EA on the draft FRMP2 2021-2027. Ipswich is	Additional bullet point added to paragraph 1.3.1 to reflect this.

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		identified as a Flood Risk Area and we developed 5 intervention measures in consultation with stakeholders.	
Flood and Water Management SCC	4.1.4	Add Land Drainage Consent for alterations to ordinary watercourses (Land Drainage Act 1991 S23), and if its main River then EA consent may be required	Text added
Flood and Water Management SCC	6.1.3	There is standing advice that developers/landowners/consultants should refer to on SCC website first, this is the web page <a href="https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/">https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/</a>	Text added, together with a link to the web page.
Flood and Water Management SCC	6.1.4	Suffolk Flood Risk Management Partnership - website address above should be added	Website address added
Flood and Water Management SCC	7.1.1	Add another bullet 'Development in a 'critical drainage area' as identified in the Ipswich SWMP'	Added (5 <sup>th</sup> bullet)
Flood and Water Management SCC	7.1.2	Developers would need to assess the impact of displacing surface water by ground raising. If the ground raising is in a mapped or known flood risk area then it will have some impact, and an FRA will determine the scale and nature of the impact	Text added (3 <sup>rd</sup> bullet)
Flood and Water Management SCC	7.1.2	The SFRA should be referred to by applicants.	Agreed – covered by 5 <sup>th</sup> bullet
Flood and Water Management SCC	Table 8-2	The EA carry out Breach modelling so applicant needs to consider this in the impacts on the development.	Text added addressing breach modelling.
Flood and Water Management SCC	Section 9 Flood warning and evacuation	The most appropriate approach for managing the future fluvial flood risk from the River Gipping needs to be developed in conjunction with the EA and JEPU / Suffolk Resilience Forum re evacuation/site specific flood plan by applicant.	New Paragraphs added – 9.2.45 and 9.2.49

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Flood and Water Management SCC	9.6.3	Could this be reworded to remove the emphasis on SuDS being something that could be perceived as negative and instead an integral part of all new development & redevelopment. SuDS such as green/blue roofs, vertical rain gardens, tree pits & planters are all very compatible with high density development. Surely town centre sites are the most at need of a little 'green/blue' space and amenity space?	Agreed, text added (and also illustrations from the CIRIA Manual to show SuDS in higher density development – see Appendix 7).
Flood and Water Management SCC	9.6.4	This is no longer referred to in Appendix A to the Suffolk FRMP. See Section 1 of the attached App A draft for new wording.	Text deleted and footnote added referring to emerging Appendix A.
Flood and Water Management SCC	9.6.6	This wording does not reflect current operational practice more reflective of the emerging draft Appendix A.	Text amended to fit more modern practice as requested.
Flood and Water Management SCC	9.6.11-9.6.15	The approach is increasingly geared towards managing water runoff as a resource than a waste product. Perhaps this section could reflect this better? The approach is increasingly geared towards managing water runoff as a resource than a waste product. Perhaps this section could reflect this better?	Text amended but also includes the reference to the 'three goals' as this comes from Flood Risk PPG.
Flood and Water Management SCC	9.6.15	Water Harvesting should be prioritised. The whole ethos behind SuDS is to create pleasant places to live and also to reduce the impact of the development on the environment through water re-use at source.	Agreed bullet point moved to the top of the list and wording changed
Flood and Water Management SCC	Table 9.2	There needs to be a minimum 1.2m separation between the base of the infiltration feature and the highest groundwater level in relation to a high water level. Combine filled land and contaminated land, as so similar in nature.	Agreed Table wording amended
Flood and Water Management SCC	9.6.17	Please refer to the Green Suffolk website at the end of the para.	Paragraph amended accordingly
Flood and Water Management SCC	9.6.18	12-15% of the site area of all new Outline developments need to be dedicated to SuDS	Paragraph amended accordingly

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Flood and Water Management SCC	9.7.1	Could this refer to App A to save repetition See sections 4 (Suffolk general design principles) and 5 (Suffolk specific design principles).	Paragraph amended accordingly
Anglian Water	Section 9	AW is surprised that SuDS are not covered in detail until page 48 and trust that both the EA and LLFA are content that structure of the document and the location of SuDS within the SPD does not reflect the importance of SuDS as their and our preferred way forward?	The EA and LLFA have not expressed concerns about the structure of the SPD in terms of where guidance about SuDS appears. Because SuDS are a measure to manage and mitigate surface water flood risk, there are stages in the development application process – such as the sequential test and preparing an FRA – which necessarily need to be covered first. Section 9 places great emphasis on SuDS as one of several measures that applicants will need to consider, and also refers to the SWMP Appendix A produced by the County Council which provides guidance on SuDS. Nevertheless, wording has been added to 2.4.2 which refers to the SuDS guidance set out in section 9.6 of the SPD.
Anglian Water	2.4.2	Firstly, we suggest that paragraph 2.4.2 is revisited as it can be interpreted several ways and perhaps could be worded more positively. On this we acknowledge the problem of extreme events and so suggest a change to the 'not cost beneficial' text	An extra sentence has been added to the end of paragraph 2.4.2 as suggested: 'Anglian Water is working with the

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		which could be read as 'it costs too much'. One option is an extra sentence at the end of that section that reads something like 'Anglian Water is working with the Council, County Council and Environment Agency to seek other climate adaption measures, for example surface water management improvements required to be implemented as part of new development set out in section 9.6'. Alternatively, you could reference Policy CS17 in the adopted Local Plan which sets out who the Council is working with partners to address flood risks. This would ensure consistency between the adopted Plan & the draft SPD.	Council, Suffolk County Council and Environment Agency to seek other climate adaptation measures, for example surface water management improvements. These are required to be implemented as part of new development as set out in section 9.6 of the SPD, which includes advice on the use of sustainable drainage systems (SuDS) in new developments.'
Anglian Water	5.2	Anglian Water often has limited options other than to extend/ build in the flood zone because our facilities are already located there due to historic circumstances and the engineering requirements of our water and wastewater networks. It's good to see you/ the Council as LPA is taking a pragmatic approach on the sequential test. For example, we agree that existing essential infrastructure sites may be the most appropriate locations for expansion to support new communities and business. This is because maximising the use of existing infrastructure capacity reduces both the impact on communities from construction at new sites as well as the cost to customers. Importantly using existing sites also significantly reduces the embedded carbon from construction which is inevitable if new sites/ facilities have to be found and developed. That site/ development is also then potentially on land which can be used for new housing, community facilities and business which arguably it is more important to locate outside of flood zones.	Comment noted. Section 5.3 allows some flexibility on area of search for the sequential test.
Anglian Water	5.3.2-5.3.3	Anglian Water is committed to making increased use of renewable energy as a key part of our strategy to reaching carbon net zero by 2030. We are already generating solar energy on several of our	The Council agrees that some flexibility may be needed to address non-carbon

<b>Respondent</b>	<b>Part of Draft SPD</b>	<b>Specialist Call for Ideas comments received, April-June 2021</b>	<b>IBC Response</b>
		<p>sites and plan to bring forward more with the support of forward-thinking Councils. It takes a substantial amount of power to source, treat and pump water across the region to our six million customers. This has a significant impact on our carbon footprint. Renewable energy including solar installations can be developed at most of our sites and has long term potential to enable a transition from other energy forms. By harnessing energy from renewable sources, we can help power our operations and seek to significantly reduce our carbon emissions and so help protect the environment for future generations. When considering options for supporting growth Anglian Water will therefore want to prioritise sites which offer the ability to reduce and minimise our carbon impact including renewable energy generation opportunities. This would support the adopted Local Plan objectives including policies CS1, DM2 and CS18.</p> <p>With this in mind, on paragraph 5.3.2/ 5.3.3, Anglian Water would suggest that the area of search is the whole Ipswich area unless through pre application discussions on our schemes or those initiated as part of others development, we agree a bespoke area based on carbon/ energy, engineering and capacity requirements. We recognise that 5.3.2 and 5.3.3 covers all development and so suggest that the emphasis on this is that the search areas referenced are used as a starting point. This then supports early pre application discussions with Anglian Water, other infrastructure providers and all developers. Those discussions and agreements with the Environment Agency can then avoid the risk of challenge further down the line which takes up both Council and developer resources and can unnecessarily delay applications.</p>	<p>based energy generation as appropriate. Wording has been added to 5.3.3 to address this, to refer to areas of search being bespoke in certain circumstances.</p>

After the draft Development and Flood Risk SPD has been subject to full public consultation, all relevant comments received will be summarised and addressed through a further iteration of this consultation statement and reported back to the Council.