

Ipswich Borough Council

Habitats Regulations Assessment Screening Report for the Ipswich Borough Council Draft Low Emissions Supplementary Planning Document 2020.

Introduction

Ipswich Borough Council is preparing a draft Low Emissions Supplementary Planning Document (SPD) to implement the following objective and local plan policies, set out in the Ipswich Local Plan (2017).

- **Objective 11** of the adopted Ipswich Local Plan is to '*improve air quality and create a safer, greener, more cohesive town*', and this is supported by a suite of policies addressing transport and accessibility; car parking in central Ipswich; design; green space and amenity. These policies are as follows:
 - **Policy CS5 'Improving Accessibility'** - *Development should be located and designed to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport (bus and rail). This will encourage greater use of these modes. The Council will support the implementation of the Travel Ipswich scheme and will work with the Highway Authority to manage travel demand in Ipswich and in doing so will prioritise the introduction of an integrated cycle network;*
 - **Policy CS16 'Green Infrastructure, Sport And Recreation'** *The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:*
 - a. *requiring all developments to contribute to the provision of open space necessary for that development according to the Borough's standards, identified strategic needs and existing deficits in an area;*
 - b. *requiring major new developments to include on-site public open spaces and wildlife habitat. On-site provision must create a network or corridor with existing green infrastructure where such an ecological network or green corridor exists beyond the site boundaries;*
 - c. *supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities;*
 - d. *working with partners to prepare and implement management plans for green spaces, including visitor management plans for key parts of European sites within the Suffolk Coast and Heaths AONB to be completed by 2015, and a plan for Orwell Country Park that will result in a reduced impact upon birds in the Orwell Estuary;*
 - e. *supporting the Greenways Project in working with communities and volunteers to manage green corridors in Ipswich;*
 - f. *support the enhancement of canopy cover and ecological networks;*
 - g. *working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green rim around Ipswich;*
 - h. *working with partners to ensure the provision of a new country park and visitor centre within the Ipswich Garden Suburb, and an extension to Orwell Country Park and possible provision of a visitor facility there subject to assessing its impacts on the Special Protection Area;*
 - i. *promoting improved access to existing facilities where appropriate; and*

j. reviewing the town's estate of sports facilities to consider how they can best meet the needs of a growing population.

Policies in this plan and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document identify existing, new and proposed open spaces, sport and recreation facilities, green corridors and networks and allocate sites for new open spaces and facilities.

- **Policy CS20 'Key Transport Proposals'** - *The Council supports measures to improve sustainable travel options, including the Travel Ipswich scheme, which aims to reduce dependency on the private car by 15% within the lifetime of the Plan. This will improve bus station provision, passenger information, shuttle bus provision and pedestrian links between the Central Shopping Area, the railway station and Waterfront. The Council also supports the completion of the upgrading of the Felixstowe to Nuneaton rail line. In the short term the Council will look to close the Waterfront Northern Quays route to general traffic, maintaining access only for pick up/drop off and the shuttle bus. The Council will support further measures to facilitate cycling and walking in the Borough, as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document;*
- **Policy DM5 'Design and Character'** - *The Council will require all new development to be well designed and sustainable. In Ipswich this will mean:*
 - a. *layouts and designs that provide a safe, attractive, permeable, legible and useable public realm for all users, which is pedestrian, and cycle orientated;*
 - b. *areas which function well and where possible integrate residential, working and community environments and fit well with adjoining areas;*
 - c. *the promotion of safe and secure communities;*
 - d. *greener streets and spaces to contribute to local biodiversity, visual amenity, and health and well-being, and offset the impacts of climate change;*
 - e. *protecting and enhancing the special character and distinctiveness of Ipswich, including significant views that are recognised as being important and worth protecting, the setting of any nearby listed buildings, and helping to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene;*
 - f. *developments that exhibit good architectural quality, are sustainable and accessible and are designed for long life by being capable of adaptation to accommodate changing needs and uses over time;*
 - g. *ensuring that new development incorporates cycle and waste storage, public transport infrastructure and car parking if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity;*
 - h. *new buildings in or around Air Quality Management Areas will be designed so that their size and layout will preferably reduce, and at the very least not increase, localised retention of polluting emissions, and will include ventilation systems that protect the health of users of the buildings; and*
 - i. *provision of public art where this would be required to enhance the public realm and/or reinforce a sense of place, which may include new installations where this would be commensurate to the scale and type of development or otherwise take the form of bespoke paving, street furniture and landscaping.*

Design that is considered not to adequately meet all these criteria will be refused.

In new 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.

- **Policy DM10 ‘Protection of trees and hedgerows’** - *The Council will protect and ensure the care of trees and increase canopy cover in the interests of amenity and biodiversity by:*

 - a. *making Tree Preservation Orders;*
 - b. *in relation to applications for works to trees, only granting consent for felling, topping, lopping or uprooting if a sound arboricultural reason is provided;*
 - c. *adhering to the principles of BS3998 ‘Tree work – Recommendations’ 2010 for established tree management options (including soil care and tree felling);*
 - d. *refusing planning permission for development resulting in the loss or deterioration of aged or veteran trees found outside ancient woodland unless the need for, and benefits of, the development in that location clearly outweigh the loss; and*
 - e. *encouraging tree planting to help achieve a target of 22% canopy cover by 2050.*

Applications for development should retain existing trees and hedgerows of amenity or biodiversity value where possible. Where development affecting trees or hedgerows is proposed, the application must be accompanied by:

 - f. *an accurate survey and assessment of all existing trees and hedgerows on site in accordance with BS5837 ‘Trees in relation to design, demolition and construction – Recommendations’ 2012 by a competent arborist; and*
 - g. *details of protective measures to be put in place during the development process to ensure the health and safety of each specimen and hedgerow to be retained; and*
 - h. *where removal of a mature tree is proposed, a plan for replacement planting on a two for one basis and using semi-mature specimens, unless otherwise agreed by the Council.*

Design in new development should have proper regard to the setting of protected trees. Landscaping and tree planting should be integrated into new development.

- **DM17 ‘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 adverse impact on rights of way or the local road network in respect of traffic capacity, highway safety;*
 - b. *not result in a significant impact on air quality or an Air Quality Management Area;*
 - c. *incorporate electric vehicle charging points and a car club scheme, or if not viable the infrastructure to secure their future delivery, where this would be consistent with the scale and location of the development;*
 - d. *promote pedestrian and cycle accessibility to and permeability within the site, ensuring that any new routes are coherent and in accordance with the design principles of policy DM5;*
 - e. *provide high quality, secure cycle storage, and in non-residential developments of more than 1,000 sq. m or where more than 50 people will be employed, high quality shower facilities and lockers; and*
 - f. *have safe and convenient access to public transport within 400m, and facilitate its use through the provision of services, infrastructure and/or tickets where required.*

Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated.

- **Policy DM18 Car and Cycle Parking’** - *The Council will require adopted standards of car and cycle parking to be complied with in all new development (except in the IP-One area), 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 secure cycle parking in any new car parks in the town.*

Cycle parking across the Borough is required to be secure, sheltered, conveniently located, adequately lit, step-free and accessible.

Outside the IP-One area, 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 reduced maximum standards of car parking provision 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.

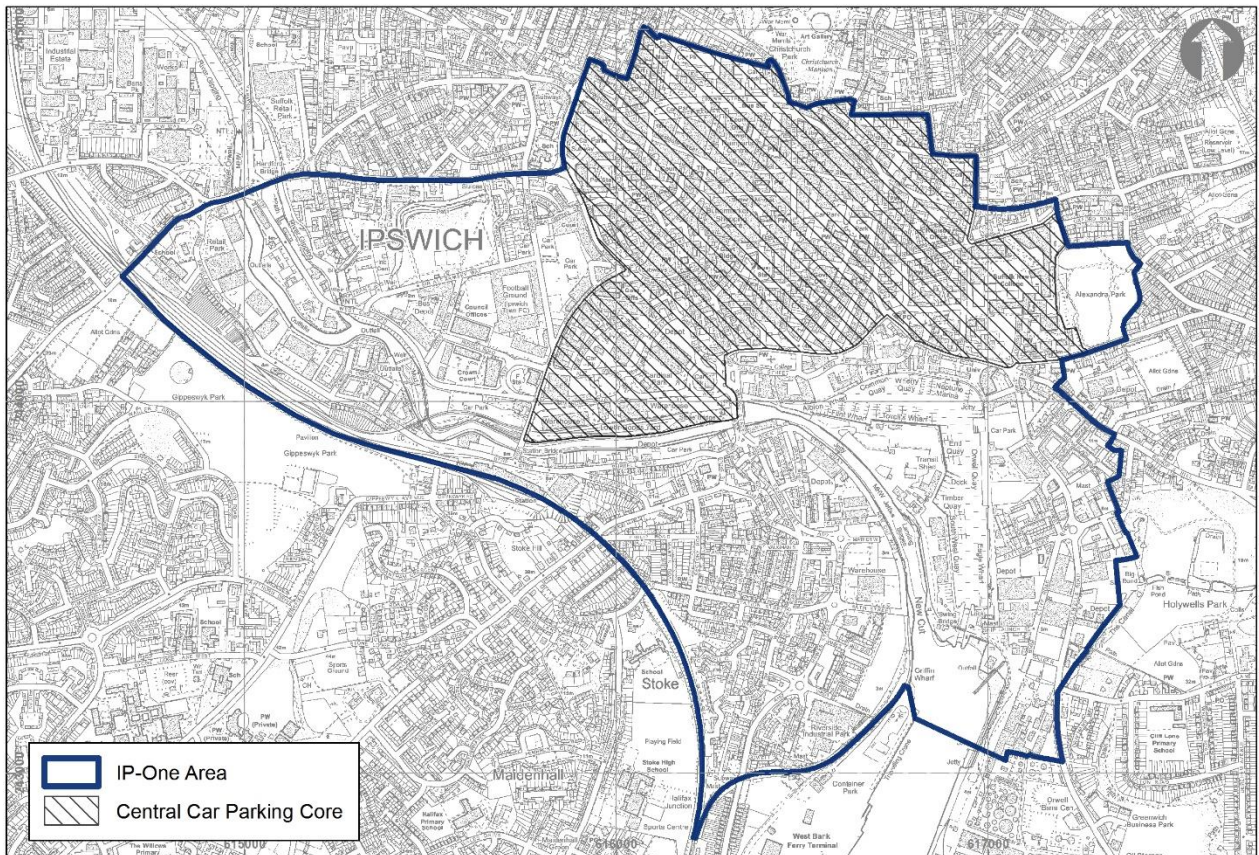
A central car parking core will be defined in the town centre, through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. Within the central car parking core, only operational car parking will be permitted in connection with non-residential development,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

- **Policy DM26 ‘Protection of Amenity’** - *Planning permission for any development (including change of use) will not be permitted where it would likely cause material nuisance to the proposed, existing and / or adjacent users, residents, occupiers or where it is liable to be detrimental to human health.*
Development which could itself be significantly adversely affected by the conduct of established or potentially noisy or polluting uses nearby will not be permitted.
Exceptions will only be made where satisfactory mitigation measures can be secured through the use of planning conditions or Section 106 Agreements.
- **Policy DM29 ‘Provision of New Open Spaces, Sport and Recreation Facilities’** - *The Council will ensure that public open spaces and sport and recreation facilities are provided through new developments to meet the needs of their occupiers and, where appropriate, contributions are provided to strategic accessible natural greenspace.*
In all new residential developments of 15 dwellings or more (or on sites of 0.5ha or more), at least 10% of the site area, or 15% in high density residential developments, should consist of on-site green space that is usable by the public, which will contribute to meeting the overall requirement. Where possible, public green spaces should be well overlooked, and the provision within large-scale developments should be distributed throughout the site.
These developments would also be expected to mitigate their own impact through the provision of the various open space and facility typologies identified in Appendix 6. Where the need for provision is triggered, there will be a presumption in favour of on-site provision.
Where this is not practicable or the Council prefers enhancement opportunities at existing facilities, or the area generated by applying the standard is smaller than the Council’s minimum size, then an in lieu contribution to new or existing off-site provision should be secured through a planning obligation. There may be circumstances where development would more suitably accommodate greater provision of one typology at the expense of another. Such circumstances will be considered on their merits.
Where the quantity standard for a typology would not meet the minimum size threshold, a qualitative assessment of existing provision within the Appendix 6 accessibility standard distance from the site (480m or 720m) should be made to determine whether an enhancement opportunity exists. Where a reasonable improvement can be identified, a contribution should be secured where this would be necessary to make the development acceptable.
The effect of on-site provision and/or off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.
One-for-one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on the overall requirement. In addition,

standards for children's and young people's facilities will not be applied to elderly persons' accommodation and nursing homes. On small, high density infill developments of 15 to 40 dwellings, the requirement for 15% on-site open space provision will be applied flexibly where it can be demonstrated that compliance would reduce the number of dwellings that can be delivered. For non-residential developments of 1,000 sq. m floor space or more, the provision of or a contribution to public open spaces and outdoor sports facilities will be negotiated on a case-by case basis.

- **The Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD** - makes the key land use allocations for uses such as housing, employment and retail use, and describes an indicative capacity for the residential site allocations and the other site uses. Site sheets set out in Appendix 3A of the Site Allocations and Policies DPD identify where sites lie within or close to an AQMA.
- **Policy SP15 'Improving Pedestrian and Cycle Routes'** - 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 Mather Way;
 - 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, Queen Street and Upper Brook Street.
- **Policy SP17 'Town Centre Car Parking'** - The Council will pursue a town centre car parking policy with the twin aims of supporting the economy of the town centre and limiting congestion, through supporting the Travel Ipswich measures and encouraging the use of sustainable modes of transport. To this end, a Central Car Parking Core is identified on the IP-One inset policies map. Within this area, Core Strategy review policy DM18 shall apply. Sites are allocated for medium sized multi storey car parks providing additional short stay shopper and visitor parking at:
 - IP055 Crown Street (on the existing Crown car park site), and
 - IP048 Mint Quarter.It is also expected that development at IP049 No 8 Shed Orwell Quay will provide public car parking. Development at IP054 Turret Lane (east side) could also include a short stay multi-storey car park for public use. A site IP015 is allocated for long stay commuter car parking at West End Road. This will replace surface parking currently provided at West End Road and also that at Portman Road if it is not replaced on site. Proposals for additional temporary car parks within the town centre will not be permitted. Proposals to renew existing planning consents for temporary short stay public parking within the town centre will not be permitted when the permanent provision allocated above has been delivered.

A map of the IP-One Area of central Ipswich showing the Central Car Parking Core is provided below for information



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Ipswich has five designated Air Quality Management Areas at locations where the annual mean concentration of nitrogen dioxide (NO₂) exceeds the national objective level. Nationally and locally, the main source of high levels of NO₂ is from vehicle emissions. The Council's Air Quality Action Plan 2019-2024 acknowledges air pollution as a major public health risk ranking alongside cancer, heart disease and obesity. It outlines the actions that Ipswich Borough Council want to see delivered between 2019 and 2024, in order to reduce concentrations of air pollutants and exposure to air pollution. The Air Quality Action Plan complements the Local Plan approach to air quality and its actions extend beyond the scope of land use planning.

Through supporting the implementation of the adopted Ipswich Local Plan policies above, the aim of this SPD is to ensure that new development contributes to improving air quality across Ipswich and thus to improving the environment and health of the population. This will be achieved through avoiding and reducing new emission sources where possible and encouraging emission reductions, physical activity and healthy lifestyle choices. The SPD will:

1. Provide clarity about how the Local Planning Authority (LPA) intends to interpret and implement relevant Local Plan policies through the planning application process;
2. Provide advice for developers and their consultants on how to assess and mitigate the impact that new developments may have on local air quality; and
3. Set out a proportionate and consistent approach by developers and the LPA to:

- Addressing the impacts of proposed development on local air quality;
- Ensuring optimum scheme design relating to air quality, and;
- Avoiding unnecessary delays in the planning process.

The SPD will also set out car parking guidance for development proposals within the IP-One Area defined in central Ipswich. The reason for including car parking guidance for development within IP-One in this SPD is to ensure that the approach to parking provision in central Ipswich does not undermine actions to improve the Ipswich Air Quality Management Areas through modal shift.

What is the purpose of this statement?

The purpose of this statement is to assess the need for appropriate assessment in relation to the Low Emissions SPD.

The SPD does not create new policy but provides detail in respect of the implementation of the adopted Ipswich Local Plan 2017 policies identified above.

The SPD will set out a consistent and proportionate approach to assessing and mitigating air quality impacts from new development and managing car parking provision within developments in the IP-One Area of central Ipswich, 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.

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;

- 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)

- 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 Low Emissions SPD to assess whether Habitats Regulations Assessment is needed.

Table 1 Screening of the draft Low Emissions SPD

HRA Step	Plan – Draft Low Emissions SPD
Likely significant impact	The draft Low Emissions SPD is not expected to have a significant impact on European protected sites. The purpose of the SPD is to provide supporting information to the adopted Ipswich Local Plan 2017. The policies to which the SPD relates were themselves subject to Habitats Regulations Assessment (HRA) through the Local Plan preparation process.

	The SPD advises applicants of their responsibilities at different application and development stages and where to find information and advice. It sets out the process for identifying where an air quality assessment may be needed for a development application and lists a range of measures for mitigating the air quality impacts of new development, which may relate to transport, design, energy or green infrastructure. The parking guidance element ensures that parking provision within developments in IP-One takes place at an appropriate level to avoid undermining sustainable travel choices.
Connected to the conservation management of the site	No, the SPD does not relate to the management of a site. The Low Emissions SPD is the amplification of existing Local Plan policies - the 2017 Ipswich Local Plan HRA assessment of the policies outlined in this assessment is of particular relevance.
Screening	The SPD is not connected to the conservation management of the site, but is not likely to have a significant impact. Therefore, an appropriate assessment is not required. However, because of the relationship between the SPD and the adopted Local Plan, the Local Plan HRA of the policies outlined in this assessment is of particular relevance.

The Local Plan addresses development and air quality in two ways: whether development, individually or cumulatively, would impact on air quality in Ipswich, and whether development in or adjacent to existing Air Quality Management Areas can ensure that its residents will not be exposed to unacceptable levels of pollution.

The Low Emissions SPD supports the implementation of Local Plan policies by:

- explaining how the air quality aspects of planning applications will be considered;
- identifying the information applicants would need to submit with an application, to enable the Council to assess impacts on air quality;
- prescribing the types of mitigation measures that will be required where impacts are identified, in the form of menu lists; and
- Providing appropriate car parking guidance for new development within the IP-One area of Ipswich in support of policy DM18.

Therefore, through supporting the policy framework to improve air quality and mitigate the impact of new development, the Low Emissions SPD may indirectly have a positive impact on the European sites, because it will help to reduce the level of vehicle emissions in Ipswich arising from new development.

The screening assessment above of the Low Emissions SPD refers to the final HRA published alongside the preparation of the now adopted 2017 Ipswich Local Plan, in relation to:

- Objective 11, which supports improving air quality and is supported by a suite of policies addressing transport and accessibility - policies CS5, CS20, DM17 and SP15; car parking

in central Ipswich (policies DM18 and SP17); and design, amenity and green space (policies CS16, DM5, DM10, DM26 and DM29).

This is because the process of HRA in relation to the local plan is iterative and impacts are mitigated as each local plan stage is achieved, for example, at issues and options stage, preferred options stage, Regulation 19 final draft local plan stage and post-examination formal modifications stage.

What were the conclusions of the appropriate assessment?

The adopted Ipswich Local Plan 2017 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.

Does this SPD need an additional appropriate assessment?

In supporting policies to address air quality in Ipswich, there will not be significant impacts for the Stour and Orwell Estuary SPA and Ramsar site arising from the draft Low Emissions SPD. Similarly, in relation to the identified sites which lie outside the Borough in neighbouring Districts which could potentially be affected by development within Ipswich Borough, 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 were consulted on this Screening Assessment and responded as follows:

'We welcome the aim to address air quality issues within Ipswich and the measures set out in the draft report. I can confirm that Natural England agrees with the Council conclusion that SEA and HRA are not required for the draft Low Emissions SPD.'

This confirms the Council's conclusion that Habitats Regulations Assessment is not needed for the Low Emissions Supplementary Planning Document.

Date: 1st September 2020