

Ipswich Borough Council Local Plan

Topic Paper: Green Infrastructure Provision

Evidence on the green infrastructure provision required in Ipswich Borough to 2031

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IPSWICH
BOROUGH COUNCIL

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Introduction

What the Council is doing

1. The Council is currently preparing a review of its adopted Core Strategy and Policies development plan document (December 2011) and a Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document. These documents form the Council's Local Plan, which guides future development in the Borough.
2. Proposed submission versions of the two plans were published for public consultation on 12th December 2014, under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This followed on from an informal consultation (under regulation 18) which was undertaken between January and March 2014. Following representations received on the Proposed Submission plans and changes in national policy, in October 2015 Pre-Submission Main Modifications were published for consultation.
3. The Core Strategy and Policies development plan document review (hereinafter referred to as the Core Strategy review) will replace the adopted Core Strategy and Policies development plan document when adopted (anticipated in mid-2016).
4. The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document (DPD) (hereinafter referred to as the Site Allocations Plan) is a new plan. It will replace the remaining saved policies of the adopted Ipswich Local Plan (November 1997) when adopted (anticipated in mid-2016).
5. The Council is undertaking a public consultation on Pre-Submission Main Modifications to the Core Strategy review and the Site Allocations Plan and their supporting sustainability appraisal and appropriate assessment reports with addenda. The consultation period will run from Friday 9th October 2015 to Monday 23rd November 2015 and further details can be found on the Council's website, www.ipswich.gov.uk/consultations, at the Council's offices at Grafton House and the Customer Services Centre at the Town Hall, or in Ipswich libraries.

National Planning Policy Framework – Plan Making

6. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF is national planning policy and Local Plan documents such as the Core Strategy must refer to the principles established in the document.
7. The NPPF notes in paragraph 182 that the Local Plan will be assessed at the Examination in Public whether it has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.
8. The Duty to Co-operate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty on local planning authorities to co-operate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. The duty to co-operate came into force on 15th November 2011 and any plan submitted for examination on or after this date will be examined for compliance. Local planning authorities are expected to provide evidence of how they have complied with any

requirements arising from the duty. Non-compliance with the duty to co-operate cannot be rectified after the submission of a plan.

9. The Inspector will first check that the plans meets the legal requirements under s20(5)(a) of the Act before moving on to test for soundness. Legal requirements include e.g. whether it is included in the Council's Local Development Scheme; whether the Council's Statement of Community Involvement has been followed; and whether documents have been published and made available for public inspection.
10. To be sound the plan must be:
 - **'Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.' (Para 182, p. 43)
11. Paragraph 15 of the NPPF notes 'a presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay' and plans include 'clear policies that will guide how the presumption should be applied locally' (p. 4).

Definition and purpose of Green Infrastructure

12. Green Infrastructure is defined by Natural England¹ as 'a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types. Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently it needs to be delivered at all spatial scales from sub-regional to local neighbourhood levels, accommodating both accessible natural green spaces within local communities and often much larger sites in the urban fringe and wider countryside.'
13. Green Infrastructure therefore relates to the provision of a network of spaces and corridors which offer benefits for both people and wildlife and can assist in meeting numerous objectives. Amongst these wider objectives is the contribution that can be made to improving health and wellbeing. One of the four outcomes sought through the

¹ Green Infrastructure Guidance (Natural England, 2009)

Suffolk Health and Wellbeing Strategy² is that ‘Suffolk residents have access to a healthy environment and take responsibility for their own health and wellbeing’. Within this outcome priorities include ‘creating an environment where it is easy to make healthy choices’ and ‘increasing the levels of physical activity and encouraging greater use of our natural environment’. The provision of green spaces can also assist in flood/rain water attenuation, thus helping to address flood risk. The provision of accessible green infrastructure can also help to reduce recreational pressure on sensitive wildlife sites.

National Policy Context

14. The NPPF states that access to high quality open spaces for sport and recreation can make an important contribution to the health and well-being of communities. Paragraph 114 states that planning authorities should ‘set out a strategic approach in their local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’.
15. The 2011 Natural Environment White Paper³ identifies reconnecting people with nature as one of its main objectives alongside protecting and improving the natural environment, and acknowledges the role green infrastructure can play in this.
16. The Suffolk Nature Strategy⁴ sets out a strategy which includes the enhancement of habitats and networks, including through provision of urban greenspace, and facilitating access to the natural environment for people. The Strategy also identifies the importance of the natural environment to the economy of the county.

Green Infrastructure requirements in Ipswich

17. Due to the boundary of Ipswich Borough being tightly drawn and considering the nature and role of strategic green infrastructure it is necessary to consider Ipswich along with its hinterland when planning for strategic green infrastructure. The Ipswich Policy Area (Ipswich Borough and parts of the adjoining planning authority areas that function as part of Ipswich - see Appendix 3 of proposed submission Core Strategy review) represents an appropriate basis for considering provision although it should be acknowledged that areas beyond this also serve and link (or potentially link) to Ipswich.
18. In 2008 the Haven Gateway Partnership published the Haven Gateway Green Infrastructure Strategy. The aim of the strategy is to ensure that ‘everyone has access to a high quality natural and historic environment’. Using Accessible Natural Greenspace Standards, this highlighted deficiencies in green infrastructure at the strategic level and identified opportunities to enhance the network.
19. In relation to Ipswich the Strategy identified that the outer perimeter, particularly to the north and east, are particularly less well served in terms of regional, sub-regional and district levels. This considered green infrastructure of two hectares or more. The Strategy also identified that there is a deficiency in regional level accessible natural greenspace around Ipswich.

² A Joint Health and Wellbeing Strategy for Suffolk 2012 – 2022 (Suffolk Health and Wellbeing Board, May 2013)

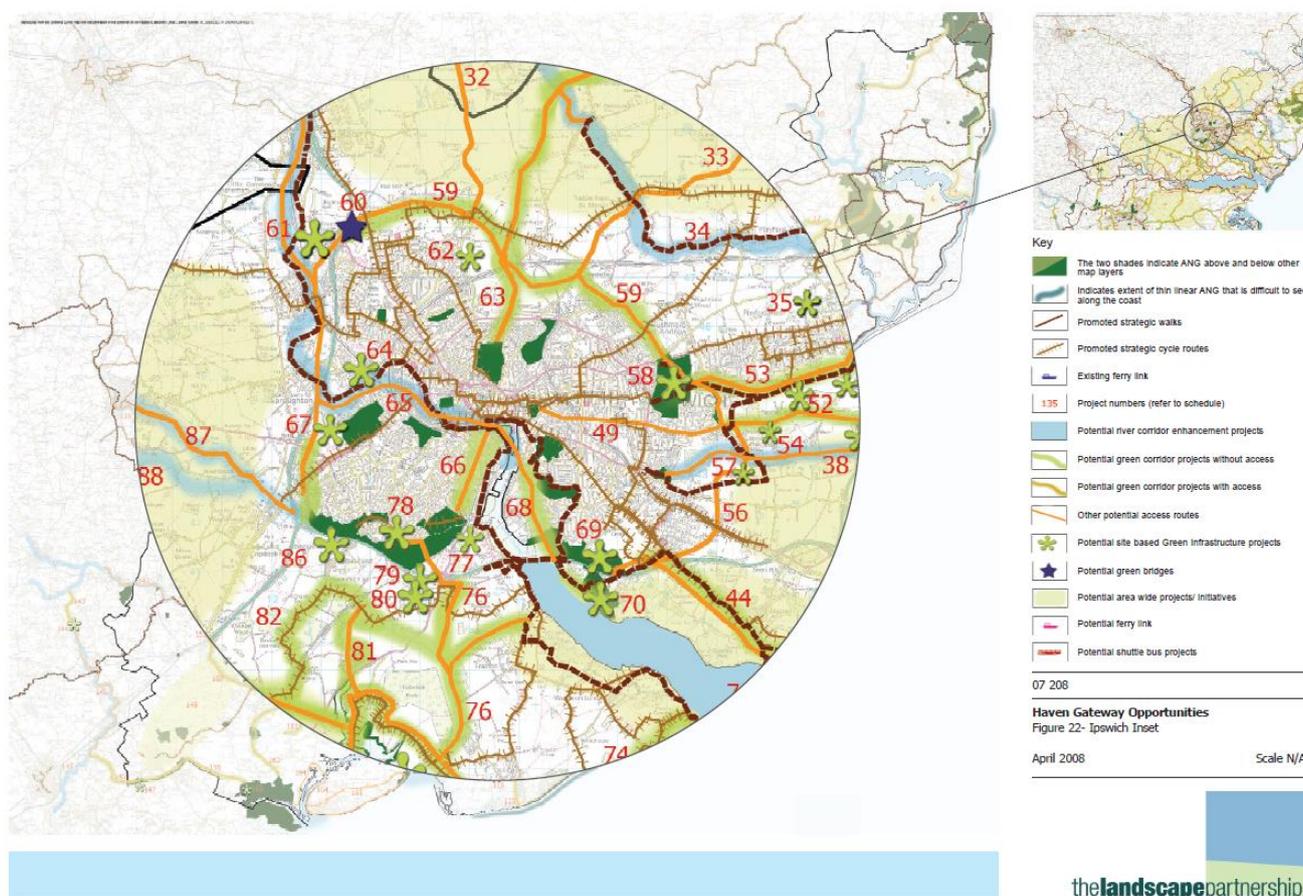
³ The Natural Choice: Securing the Value of Nature (HM Government, June 2011)

⁴ Suffolk’s Nature Strategy (Suffolk County Council, Suffolk Wildlife Trust, RSPB and the National Trust, 2014)

20. To address this, the Strategy identified a number of specific projects in and around Ipswich including:

- the creation of a green corridor around the north of the town and a green bridge to help to overcome the potential barrier afforded by the A14 at Whitehouse;
- new country parks in the vicinity of Whitehouse and Henley Rise;
- improvements to recreational access into / out of town, linking with Kesgrave / Grange Farm / Martlesham and the establishment of a country park on Foxhall Landfill site;
- improvements to the waterfront corridor providing a green access corridor linking Gipping Valley and the town centre with an extended Orwell Country Park;
- extensions to Belstead Brook Park and creation of a western green park / new country park / extension to Chantry Park;
- a new country park at Wherstead;
- open space at Grove Hill, Belstead;
- network of green corridors to the south which would provide enhanced links to the improved Alton Water and Shotley peninsula and Dedham Vale;
- the Strategy also identified Alton Water to the south of Ipswich as a potential regional level accessible natural greenspace.

21. The map below, extracted from the 2008 strategy, shows the provision of strategic green infrastructure and potential enhancements as identified at the time.



22. During 2015, planning officers within the four Ipswich Policy Area (IPA) local authorities undertook an update to the 2008 Haven Gateway strategy as part of the work programme of the IPA Board. This identified that progress within the IPA had been made since 2008, particularly in relation to improvements along the River Gipping corridor and through the establishment of the Kiln Meadow Local Nature Reserve, however the deficiencies in strategic scale green infrastructure remain broadly similar to 2008. Whilst not representing improvements on the ground, further progress has been made in relation to the proposed allocation for a country park of at least 24.5ha in size as part of the Ipswich Garden Suburb development (policy CS10) and the proposed allocation to extend Orwell Country Park (policy SP8), both within Ipswich Borough. Outside of the Borough, around 36ha of open space, representing provision of a high quality space similar to a country park, is proposed as part of the housing development at Adastral Park, Martlesham (Suffolk Coastal district). The update will contribute towards identifying options for development in the Ipswich Policy Area as part of future work to address residual housing need which cannot be met within the Borough (see policies CS6 and CS7).
23. The local plans produced for Ipswich and adjoining authority areas have each been subject to assessment under the Habitats Directive (known as Habitats Regulations Assessment and/or Appropriate Assessment). Assessments for Ipswich⁵, Babergh⁶ and Suffolk Coastal⁷ identified that the provision of housing as planned may lead to disturbance of birds in Special Protection Areas (SPAs) within and beyond each individual authority boundary. In relation to Ipswich this relates to potential effects on a number of SPAs within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Both the Appropriate Assessment of the adopted Core Strategy and Policies DPD and the Appropriate Assessment of the Proposed Submission Core Strategy and Policies DPD Review identified mitigation measures which include:
- Management measures for Orwell Country Park (south east Ipswich);
 - Provision of a new Country Park to the north or north-east of Ipswich;
 - Visitor management measures for other key European sites in the AONB;
 - Implementation of Policy CS16 (see below).
24. Whilst visitor management measures on their own would not necessarily increase the quantity of green infrastructure, they may enhance the quality of provision at these sites as well as reducing effects on European sites. A management plan for Bridge Wood / Orwell Country Park is currently being drawn up.

⁵ Appropriate Assessment for Ipswich Borough Council – Proposed Submission Core Strategy and Policies (The Landscape Partnership, September 2009)

Habitats Regulations Assessment (Appropriate Assessment) for Ipswich Borough Council – Proposed Submission Core Strategy and Policies DPD Review (The Landscape Partnership, December 2014)

⁶ Babergh District Council Core Strategy Submission Draft – Habitats Regulations Assessment Screening (Atkins, September 2011)

⁷ Appropriate Assessment for Suffolk Coastal District Council – Core Strategy and Development Management Policies (The Landscape Partnership, November 2011)

25. In addition to the provision of strategic spaces, the Council is enhancing existing spaces within Ipswich through its Parks and Open Spaces department and their partnerships with other organisations. The Council adopted an Open Spaces and Biodiversity Policy / Strategy in 2013⁸ which focuses on the provision of spaces within Ipswich (albeit that some of these will serve a wider hinterland). This identified under provision in relation to parks and gardens, amenity green space, natural and semi-natural spaces, tree canopy cover, play areas and outdoor sports facilities for the Borough as a whole although identified over provision of allotments. This under and over provision is not distributed equally across the town as particular deficiencies in open space are identified in the north of the town.
26. The Open Spaces and Biodiversity Policy / Strategy sets the framework for addressing these deficiencies including through requiring contributions to open space through new development, addressing the management of and uses provided within existing spaces and identifying green corridors. A Public Open Space Supplementary Planning Document is currently being produced which will set the framework for securing developer contributions in relation to open space provision. A Green Corridors map has been produced (see Plan 6 accompanying the proposed submission Core Strategy review) and policy DM33 sets out the policy relating to the enhancement of these. Ipswich Borough Council is working towards a target to increase tree canopy cover to 22% by 2050.
27. The Greenways Project, supported by funding from Ipswich Borough Council as well as other councils and organisations, supports the activities of local conservation groups in and around Ipswich. Actions during 2014 include new and restored footpaths in Holywells Park and habitat management along Alderman Canal⁹. Whilst these works are undertaken at the local scale they contribute towards the enhancement of the wider green infrastructure network as set out in policy CS16.

Core Strategy and Policies DPD Review and Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD

28. In recognition of the above context, policy CS16 ‘Green Infrastructure, Sports and Recreation’ of the Core Strategy review sets out the Council’s overarching policy in relation to provision and protection of green infrastructure. Policies DM28 ‘Protection of Open Spaces, Sport and Recreation Facilities’, DM29 ‘Provision of New Open Spaces, Sports and Recreation Facilities’, DM31 ‘The Natural Environment’ and DM33 ‘Green Corridors’ iterate how CS16 would be implemented through development management planning decisions.
29. The Council commits to specific projects through the emerging Core Strategy review and Site Allocations Plan which would contribute to enhancing the provision of green infrastructure in Ipswich, as set out in the paragraphs below.
30. The provision of a Country Park to the north of Ipswich will be delivered as part of the Ipswich Garden Suburb development through policy CS10 of the Core Strategy review which requires the provision of a Country Park of at least 24.5 hectares. The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (September 2014)

⁸ Open Space and Biodiversity Policy / Strategy 2013 – 2023 (Ipswich Borough Council, 2013)

⁹ Annual Report – April 2013 to March 2014 (Greenways, 2014) (Contained within Local Wildlife News September – December 2014)

contains further details relating to the implementation of the Country Park including the requirement for a network of walking, cycling and horse-riding routes, woodland planting, water features and new habitat areas, to be informed by a detailed development brief.

31. The Site Allocations Plan allocates an extension to Orwell Country Park to provide for better management of visitors.
32. At a more local level, policy SP6 (in the Site Allocations Plan) allocates two sites (IP083 'Banks of the river upriver from Princes Street' and IP263 'West of Bridge Street') for 100% open space (note that as part of the Pre-Submission Main Modifications IP263 has now been incorporated within allocation IP047). The provision of open space on these sites, alongside provision of spaces as part of other developments, will also contribute towards the establishment of networks of green infrastructure in Ipswich.

Open Space Standards

33. Appendix 6 of the Core Strategy review sets out revised open space provision standards to be applied to new development in the Borough. The revised standards result from an update of the adopted standards carried out by the Council's Parks and Open Spaces Service.
34. Since the Ipswich Open Space, Sport and Recreation Facilities Study was published in 2009¹⁰, there have been some changes to open space provision across the Borough which need to be taken into account to inform future provision:
 - The number of sites and amount of open space has increased as more sites are provided and taken on through the planning process.
 - Some sites have undergone changes to the management regime or have benefitted from improvements made to their quality or accessibility.
 - Major improvements have been possible to a number of children's play areas, due to national funding schemes e.g. the Liveability Programme. The Council adopted a revised Equipped Play Strategy on 7th October 2014.
 - New children's play areas have been adopted since the original work so that the number of equipped areas now stands at over 100.
 - A review of the original typology has resulted in a few sites being re-classified or boundaries being amended.
 - Major improvements have been made to certain sites as a result of national funding schemes, e.g. a grant of £2.8m from the Heritage Lottery Fund and Big Lottery Fund has helped to fund improvements to Holywells Park.
35. In addition, the Borough's population has grown since 2007 when the PMP survey work was undertaken.
36. Following updates to site mapping and classification, and factoring in 2011 Census population data, a detailed analysis has been carried out focusing on the five area committee areas. This has resulted in the amended open space standards proposed through the Core Strategy review.

¹⁰ Ipswich Borough Council Open Space, Sport and Recreation Facilities Study 2009, PMP

37. Policy DM29 has been amended further as part of the Pre-Submission Main Modifications to ensure that it is compliant with the legislation relating to the Community Infrastructure Levy which came into force in April 2015.
38. In reflection of the present deficiencies in strategic green infrastructure provision (see paragraph 22 above), the Pre-Submission Main Modifications also include the addition of text whereby the Council would aim to address strategic deficits where this can be achieved through also meeting the local standards for natural and semi-natural greenspace.