

IBC response to the Habitat Regulation Assessment (HRA) recommendations

<i>Habitat Regulation Assessment</i>			
<i>HRA</i>	<i>Policy/ Site</i>	<i>Recommendations</i>	<i>IBC Response</i>
Para 1.24	Whole plan, CS4 Protecting Our Assets, DM7 Provision of Private Outdoor Amenity Space in New and Existing Developments, DM8 The Natural Environment, DM9 Protection of Trees and Hedgerows	In order to make ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected.	CS4 Protecting Our Assets commits the Council to conserving and enhancing its natural and ecological assets. Policy DM7 Provision of Private Outdoor Amenity Space in New and Existing Developments acknowledges the benefits of linking ecological networks through gardens. Policy DM8 The Natural Environment requires a net gain in biodiversity in new developments. The requirement for biodiversity net gain has been applied consistently throughout the Local Plan and this will help to improve existing networks. Policy DM9 Protection of Trees and Hedgerows has an ambition to enhance tree canopy coverage in the Borough to 22% or better by 2050.
Table 3	Introduction	Recommend adding text at next plan iteration to give an up to date account of the status of the RAMS and legislative and policy context, and update sections relating to HRA.	Comment noted.
Table 3	ISPA1	Location of growth needs to be checked. Housing growth needs to be compared with current RAMS housing numbers.	Considered at appropriate assessment stage in terms of overall quantum of growth and ability of RAMS to mitigate. It is concluded that the RAMS, includes a comprehensive monitoring and review

			programme that allows for new growth in emerging local plans to be incorporated into the avoidance and mitigation measures programme.
Table 3	ISPA4 policy and supporting text (para. 8.27)	Policy ISPA4 should make specific reference to the potential need for SANG and then reference to SANG in supporting text in relation to master planning.	The policy and supporting text (para. 8.27) have been updated to include reference to the likely requirement for Suitable Alternative Natural Greenspace (SANG).
Table 3	CS4 Protecting Our Assets	Need to refer to the Habitats Regulations 2017, as amended.	Policy CS4 now includes reference to Habitats Regulations 2017, as amended.
Table 3 / 9.6	CS4 Protecting our Assets, clause b	CS4 currently does not refer to the Ipswich Wildlife Audit, and whilst it includes biodiversity enhancement, it does not specifically require biodiversity net gains through development, in accordance with the NPPF. It is recommended that this policy and supporting text could be strengthened in relation to these points.	Policy CS4, clause b, has been amended to require proposals to take account of the information and recommendations contained within the Ipswich Wildlife Audit and for new development to provide biodiversity net gains in accordance with the NPPF 2019.
Table 3	CS16 Green Infrastructure Sport and Recreation, para 8.207	Amend the last sentence of paragraph 8.207 to read 'instances where on-site mitigation is required in addition to a financial contribution.'	Paragraph 8.207 has been amended.
Table 3	CS20 Key Transport Proposals	Note that where the projects are listed in other strategic documents, HRA should be applied at both the plan and project level.	Commented noted.
Table 3	DM8 The Natural Environment, para 9.8.4	Add habitat creation, restoration or connection of fragmented habitats into paragraph 9.8.4 as options for larger developments. Bird and bat boxes should only be for small householder developments, with larger proposals	Policy DM8, paragraph 9.8.4, has been amended to include reference to the creation, restoration or connection of fragmented habitats. Policy DM8 now

		providing more significant gains for biodiversity. Need to refer to Habitats Regulations 2017, as amended.	includes reference to Habitats Regulations 2017, as amended.
Table 3	DM20 Houses in Multiple Occupation	Add to supporting text to highlight the need for contribution to RAMS.	Policy CS17 Delivering Infrastructure seeks contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the RAMS can be addressed and delivered.
Table 3	Implementation, Monitoring and Review, objective 9, indicators 3 and 4	Recommend a link is made between RAMS monitoring and review and local plan monitoring and review, so that RAMS informs local plan monitoring. Also recommend inclusion of biodiversity net gain.	Objective 9, indicators 3 and 4, have been amended to monitor habitat mitigation secured and the number of schemes complying with the biodiversity Defra metric.
Table 3	IP-One Opportunity Areas	Project descriptions close to and within the waterfront need to reference risks to European sites and the need for early assessment to inform design, as part of project level HRA.	The site sheets for projects within the waterfront refer to the need for a project level HRA.
Para 5.21	ISPA 4.1 Northern End of Humber Doucy Lane	ISPA 4.1 text should advise of the need for early design considerations to ensure that the SANG is in the right location, and of the right size, and its design is not therefore constrained by the progression of site layout prior to its consideration.	Policy ISPA 4.1 has been updated to include reference to the need for a bespoke SANG in addition to RAMS contributions.
Para 5.23	IP226 Helena Road	The site sheet requires reference to the need for a project level HRA.	IP226 Helena Road is no longer a site allocation.
Para 6.13	RAMS	It is recommended that at the next RAMS review there is greater emphasis given to the requirements for Orwell Country Park as an alternative greenspace for a number of housing sites in the immediate area, unless this work has been completed.	Comment noted.
Table 5	IP143 Former Norsk Hydro, Sandy Hill Lane	Site is very close to the estuary. Orwell Country Park could potentially attract recreation use from the development site. Orwell Country Park enhancements will be key to mitigation.	IP143 is no longer a site allocation.

Table 5	IP067a and b Former British Energy Site, Cliff Quay	Site is close to the estuary. Orwell Country Park could potentially attract recreation use from the development site. Orwell Country Park enhancements will be key to mitigation. Urbanisation impacts risk should be flagged and a project level HRA required. The site is part of a continuous habitat corridor down to Orwell Country Park, biodiversity net gain should therefore be a focus here.	The site sheet for IP067a and b has been updated to highlight the need for a project level HRA. Notable potential biodiversity net gain value from wildlife audit noted.
Table 5	IP150b Land south of Ravenswood	Urbanisation impacts risk should be flagged for the allocation and a project level HRA required.	The site sheet for IP150b has been updated to highlight the need for a project level HRA.
Table 5	IP125 Corner of Hawke Road and Holbrook Road	Site is very close to the estuary. Orwell Country Park could potentially attract recreation use from the development site. Orwell Country Park enhancements will be key to mitigation.	IP149 (Pond Hall Farm) is allocated for a country park extension which may alleviate the potential recreational pressure arising from this allocation.
Table 5	IP080 240 Wherstead Road	Orwell Country Park could potentially attract recreation use from the development site. Orwell Country Park enhancements will be key to mitigation. Urbanisation impacts risk should be flagged for the allocation and project level HRA required.	The site sheet for IP080 has been updated to highlight the need for a project level HRA.
Table 5	IP152 Airport Farm Kennels, north of the A14	Urbanisation impacts risk should be flagged and project level HRA required. Biodiversity Net Gain needs to be considered for this site.	The site sheet for site IP152 has been updated to highlight the need for a project level HRA. Notable potential biodiversity net gain value from wildlife audit noted.
Table 5	IP150d Land South of Ravenswood	Site is close to the estuary. Orwell Country Park could potentially attract recreation use from the development site. Orwell Country Park enhancements will be key to mitigation. Urbanisation impacts risk should be flagged for the allocation and project level HRA required. Biodiversity net gain should be a focus here.	The site sheet for IP150d has been updated to highlight the need for a project level HRA. Notable potential biodiversity net gain value from the wildlife audit noted.

Table 5	IP150a Land South of Ravenswood	Outline planning permission given prior to RAMs. RAMS to be considered at reserved matters.	Comment noted.
Table 5	IP200 Bath Street, Griffin Wharf	Outline planning permission given prior to RAMs. RAMS to be considered at reserved matters.	Comment noted.
Table 5	IP150e Land South of Ravenswood	Site is close to the estuary. Orwell Country Park could potentially attract recreation use from the development site. Orwell Country Park enhancements will be key to mitigation. Urbanisation impacts risk should be flagged for the allocation and project level HRA required. Biodiversity net gain should be a focus here.	The site sheet for IP150e has been updated to highlight the need for a project level HRA. Notable potential biodiversity net gain value from wildlife audit noted.
Table 5	IP037 Island Site	Site needs detailed assessment of recreation impacts. Additional mitigation at local greenspaces may be required. Other statutory and policy protected biodiversity needs to be considered. Potential for indirect impacts from water contamination, particularly during construction. Need for project level HRA. Other statutory and policy protected biodiversity needs to be considered	The site sheet for the Island Site IP037 has been updated to include reference to the site's close proximity to the Stour and Orwell SPA/Ramsar site and the needs for a project level HRA. Notable potential biodiversity net gain value from wildlife audit noted. New text highlights the potential for indirect impacts from water contamination.
Table 5	IP045 Land bounded by Toller Road, Cliff Lane and Holywells Road	Potential for indirect impacts from water contamination, particularly during construction, need for project level HRA.	IP045 is no longer a site allocation.
Table 5	IP150c Land South of Ravenswood	Project level HRA required. Biodiversity net gain should be a focus here.	The site sheet for IP150c has been updated to highlight the need for a project level HRA. Notable potential biodiversity net gain value from wildlife audit noted.

Table 5	IP226 Helena Road	Project level HRA should assess current progress with Ipswich Garden Suburb to have confidence that this alternative greenspace is available before this site comes forward. Additional mitigation at local greenspaces may be required. Potential for indirect impacts from water contamination, particularly during construction. No AEOI at plan level but a need for project level HRA.	IP226 Helena Road is no longer a site allocation.
Table 5	IP064a Land between Holywells Road and Holywells Park	Potential for indirect impacts from water contamination, particularly during construction. Need for project level HRA.	The site sheet for IP64a has been updated to highlight the need for a project level HRA. The site sheet highlights that there is potential contamination and the need for a contaminated land assessment including indirect impacts from water contamination, particularly during construction.
Para 6.15	RAMS	It is recommended that at the next RAMS review there is greater emphasis given to the requirements for Orwell Country Park extension as an alternative greenspace for a number of housing sites in the immediate area.	Comment noted.