



# NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

## **Revised Core Strategy allocates the ENTIRE Northern Fringe!**

### **Consultation closes on 5<sup>th</sup> March 2015**

\*\*\*\* THIS IS VITALLY IMPORTANT FOR THE FUTURE OF THE NORTHERN FRINGE \*\*\*\*

Despite the dire forecast of **gridlock on our roads** and **lack of infrastructure**, Ipswich Borough Council (IBC) is pressing ahead regardless with plans to create a new 'Ipswich Garden Suburb' of up to 3,500 homes on land bordered by Henley Road, Tuddenham Road, Valley Road and Lower Road (the Northern Fringe).

IBC has revised and is now consulting on two key documents:

- Core Strategy & Policies Development Plan Document, and
- Site Allocations & Policies Development Plan Document.

In association with these are Strategic Environmental Assessments and Sustainability Appraisals. The documents can all be found on the Council's website <http://ipswich.jdi-consult.net/localplan/> and will be presented during public hearings to a government appointed Inspector, who will decide if they are sound and can be adopted. **We think they are unsound and should not be adopted.**

The revised Core Strategy intends to allocate the **entire** Ipswich Northern Fringe for **immediate development** through multi-site starts. This is a high-risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of the town. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic "*....the development has a severe impact on network performance and travel time*". IBC have been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, residents will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.

#### **Other key issues include:**

- The **lack of sewage pipeline capacity** between the Garden Suburb and Cliff Quay treatment works with no agreed solution in sight.
- The **removal of a target for brownfield** site development. This should be reinstated with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.
- **No specific timescale for the delivery of the Northern Fringe Country Park**, which will increase pressure on existing green space.
- The apparent **lack of a specific jobs target for Ipswich** Borough.
- The use of **unsustainable population forecasts** based on high immigration scenarios.

IBC has a legal duty to co-operate with neighbouring Local Authorities (LAs) on cross boundary matters such as housing growth, jobs growth and strategic infrastructure. We fully support this and feel it makes much more sense to develop houses closer to sites of expected jobs growth than on the Ipswich Northern Fringe, which is poorly connected to such sites. The 'duty to co-operate' cannot be satisfied simply by creating 'a talking shop' and evidence is required of positive results – we have not seen any and so believe the revised Core Strategy is premature and should not be adopted. IBC also needs to explain how its recent £10M purchase of the old Sugar Beet site, which is outside the Borough and lies within Babergh Council, fits into its Core Strategy that is supposed to focus new employment in the town centre.

Together we need to make our case to the Inspector to show that the Core Strategy is unsound to stop this damaging development happening. The consultation finishes on 5<sup>th</sup> March 2015 and comments will be made available to the Inspector so this is an excellent opportunity to have your say. *They will only be considered if they show the Core Strategy to be unsound and must be referenced to specific sections of the document.* You can submit your views online via the Council's website link shown above, else you may find it helpful to simply complete and return the tick sheet overleaf. We will also be making detailed submissions on behalf of our members and people who have asked us to represent them, but every submission counts.

	<b>Title (Mr, Mrs etc)</b>	<b>Name (please print)</b>	<b>Signature</b>	<b>Date</b>
1				
2				
3				
4				
<b>Address</b>				<b>Postcode</b>

<b>Core Strategy &amp; Policies Development Plan Document (CS)</b>	<b>Tick if you agree</b>
Chapter 4. IBC has not demonstrated that it has effectively worked with neighbouring Local Authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill and consequently the CS should not be adopted.	
Chapter 4. IBC needs to provide evidence that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council, else it will have failed in its duty to co-operate. It needs to explain in the CS how this strategic purchase aligns with the employment and housing growth strategies and targets. Currently the CS is unsound.	
Policies CS 17 & CS20. Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution fresh water and wastewater. As such the plan will not be effective and is unsound. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation methods can be implemented. Freshwater and wastewater infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	
Policy CS10. It is unsound to allocate the entire Ipswich Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The Council's population forecast should not be based on a high immigration scenario, which is inconsistent with the policies of all main political parties.	
Para 6.8 Objective 3(b) & CS13. Without properly defined specific and measurable jobs growth objectives the CS is unsound. To improve clarity and effectiveness 2 jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators should be specified.	
Policy CS13. A recent report by Peter Brett Associates (listed on the IBC website) calls into question the viability of developing new offices, industrial units, warehousing and large retail offerings within Ipswich. This challenges the ability of the CS to deliver the massive jobs growth target. For soundness the CS needs to address the severe obstacle to growth identified and produce a specific and realistic jobs target for the Borough of Ipswich.	
Para 6.8. The housing target Objective 3(a) is so poorly defined as to be ineffective and as such the CS is unsound. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and progress measured.	
Policy CS10. The CS cannot guarantee the delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat, namely the Stour and Orwell Estuary Special Protection Area. For soundness policy CS10 and Infrastructure Table 8B need to be revised.	
Para 8.28 & CS2. For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land.	

Please return by **5<sup>th</sup> March 2015** to: Planning Policy, Ipswich Borough Council,  
Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

All comments will be made publicly available and cannot be kept confidential.