



## **NORTHERN FRINGE PROTECTION GROUP**

### **Safeguarding the Character of Ipswich**

#### **Comments on the Ipswich Borough Council Draft Core Strategy and Policies Focused Review – 13<sup>th</sup> January to 10<sup>th</sup> March 2014**

##### **Summary of key issues**

We welcome the intention to review the IBC Core Strategy (CS) using the most up to date evidence base and support the three key areas of housing growth, jobs growth and infrastructure, rather than a complete review. We appreciate the difficulty and uncertainty in making long-term forecasts and plans and recommend that future periodic reviews of the Ipswich Core Strategy are undertaken. This will allow the strategy and plans to respond and adapt to changing circumstances.

We have a number of major concerns with the proposed changes in the Core Strategy, which mean that in our opinion it is currently unsound and we suggest improvements to overcome these issues. Our comments should be read in conjunction with those on the Site Allocations DPD and the respective Sustainability Appraisals.

The NFPG has always supported an employment-led strategy as contained within the adopted Core Strategy providing it is based on evidence rather than just aspiration. We are concerned to see that IBC has radically changed its focus from a jobs-led to a housing needs-led strategy. Whilst appreciating that the National Planning Policy Framework places a new requirement on Local Authorities to ensure their Local Plan (and Core Strategy) meets the full objectively assessed needs for market and affordable housing as far as is consistent with the policies set out in the Framework, this does appear to have been given undue weight over other NPPF requirements, a key one being sustainability. Section 7 of the NPPF defines sustainable development having 3 roles namely:

- An economic role – contributing to building a strong, responsive and competitive economy.
- A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations.
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment.

Section 8 of the NPPF states ‘to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system’.

For sustainability we would argue that housing and jobs growth must be in balance and ideally situated in reasonably close proximity with good sustainable transport links so as to lessen the impact on the environment. The implication of new homes being constructed in Ipswich Borough without sufficient new jobs being created will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Neither of these outcomes is sustainable. In particular, one of the main arguments that the Ipswich Northern Fringe housing development was sustainable was that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. Hence the revised CS is unsound.

A key issue we have is that the jobs growth target for Ipswich is pretty meaningless. From CS Section 6.8 bullet 3(b) and Objective 3 page 144, the proposed target reads ‘up to 12,500 additional jobs

shall be provided in Ipswich to support growth in the Ipswich Policy Area between 2011 and 2031.' Although clearly not the intention, this target can be achieved with just a single additional job being created! Compare this with the firm target for housing growth 'to deliver at least 13,550 homes by 2031'. We acknowledge IBC is showing commitment to achieving jobs growth in Ipswich through its Economic Development Implementation Plan but it needs a firm target for Ipswich Borough to be able to drive forward this plan.

**Recommendation 1** The Core Strategy will be improved by including a firm jobs growth target for Ipswich Borough between 2011 and 2031 and this can simply be achieved by deleting the words 'up to' in Section 6.8 bullet 3b and other occurrences within the Strategy so that it reads '12,500 additional jobs shall be provided in Ipswich Borough.' The target of 12,500 jobs will need revision in the light of more up to date evidence e.g. the 2013 run of the East of England Forecasting Model, the 2011 Census commuting data expected in March 2014 and local circumstances not reflected in the national models.

**Recommendation 2** Although we believe it right for IBC to support the growth sectors identified in both the Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership (NALEP) 2014 Strategic Economic Plan, it is also vitally important to focus on the top growth sectors identified for Ipswich, which are different (See our comments regarding Pages 63-64). This needs to be made clear in the CS to ensure it gets translated into both the Ipswich Economic Strategy and the Ipswich Economic Development Strategy Implementation Plan. The key sectors that appear not to be adequately reflected in the latter are:

- Business Services.
- Professional & Technical Services.
- Health & Care.

**Recommendation 3** We are particularly disappointed that Ipswich town centre has not been identified in the Suffolk Growth Strategy or the NALEP 2014 Strategic Economic Plan as a principle growth centre since there is a pressing need for regeneration and jobs growth in the town centre and the jobs growth focus will lie elsewhere. In view of the local expertise in the Insurance industry we feel more could be done to attract investment and new jobs into Ipswich town centre to exceed the current low growth forecasts. We suggest this sector be given a greater priority by IBC and note that it is given a mention in the Suffolk Growth Strategy. Also this would align with the NPPF key requirement to ensure the vitality of town centres.

**Recommendation 4** Ensure the CS retains as one of its goals the need to obtain a balance between homes growth and economic growth, a prime requirement of the NPPF. This will require not deleting some of the wording in CS13 Planning for jobs growth as proposed in this review e.g. the third sentence of Paragraph 8.141 'The town cannot support a growing population without commensurate change in the level of accessible jobs provision.'

We note that the housing growth target of at least 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring Local Authorities to make up the shortfall of 4,611 dwellings (Paragraph 8.83 last sentence refers).

We support the efforts that the Council has made in using existing models and forecasts and in commissioning the Research and Geospatial Information team of Luton Borough Council to produce Population and Household projections for Ipswich and the surrounding Local Authorities. However, there are a number of flaws in these forecasts and these include:

- The data is not up to date e.g. the East of England Economic Forecasting Model (EEFM) data used was for the September 2012 run, instead of the 2013 EEFM run (the latter but not the

former having 2011 Census data) and the latest ONS data has not been used. As an example the ONS international migration data used in the study only went up to 2010/11 and used an average of the past 5 years with the net gain decreasing in recent years to just nine in 2010/11. The latest data shows 2011-2012 continued this trend by going negative (-500), which changes the 5 year average net international migration used in the model projections from 283 per year to 157 per year. This has a significant effect on the outcome as it is below the low migration scenario, which IBC considered and rejected as unlikely. This clearly shows that the Trend Migration scenario is flawed and should be rejected.

- The Department of Communities and Local Government's (DCLG) 2011 household projections were not given appropriate consideration and appear to have been dismissed on the basis that the figures were calculated during the recession. However, the figures are reasonably up to date being released on 9<sup>th</sup> April 2013, include the 2011 Census data unlike the EEFM 2012 results, and come with a government endorsement: "The household projections produced by DCLG are statistically robust and are based on nationally consistent assumptions." "Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence." Although the projections only go up to 2021 the results can be easily extrapolated to 2031 with an almost perfect correlation.
- The Ipswich household data of 58,700 does not accord with the 2011(April) Census value of 57,300 nor the corresponding 2011 mid year figure produced by DCLG of 57,433
- The Sustainability Appraisal/SEA process requires an examination of the baseline information of the Borough 'as it is now' together with data on 'how it may change in the future'. The CS and its SA must therefore be based on the best data available, which is not the case as it fails to utilise the most recent DCLG or EEFM 2013 forecasts. Both the CS and the SA are therefore unsound.

**Recommendation 5** IBC should revisit the Ipswich Population and Household projections and revise the population and household targets giving proper consideration to the DCLG 2011 data and the latest data including that from the ONS, the EEFM models and by incorporating the 2011 Census Commuting numbers expected in March 2014. .

**Recommendation 6** IBC should investigate the household data figure of 58,700 shown for 2011 and make any necessary corrections.

The only principle employment growth site within the Ipswich boundary is the A14/Ravenswood/Futura Park/Ransomes Euro park expansion. The next two nearest sites are the Former Sugar Beet Factory and Adastral Park. None of these are within easy reach of the proposed Northern Fringe housing development by public transport or other sustainable transport means. Since significant jobs growth is not forecast in the Town centre then commuting by car would seem inevitable. An inspection of the jobs growth forecasts from the Babergh, Mid Suffolk and Suffolk Coastal Core Strategies and the IBC CS Focused Review show:

- The combined CS forecast jobs growth is 38% higher than the total forecast by the EEFM August 2013 data across these authorities. There is a major risk that the individual jobs targets of each local authority are unrealistic when compared to the total potential across the four authorities.
- The higher growth is mainly due to significant differences being forecast by both Babergh and Mid Suffolk CSs compared with the EEFM forecast. In the case of Babergh the EEFM jobs growth forecast from 2011 –2031 is 2545 jobs whereas the CS forecast is 9700 jobs i.e. a difference of 7155 jobs, or in other words 3.8 times as many jobs! For Mid-Suffolk the EEFM forecasts 4400 new jobs whereas the CS 11100 jobs i.e. 6700 more or 2.5%.
- According to Babergh, part of the rationale behind this major difference in forecast jobs growth is that some of the economic growth needed for Ipswich Borough (which is tightly

constrained by its boundaries) needs to fall within its larger neighbouring districts. That is, there is an expectation that more Ipswich residents will commute to employment sites outside of Ipswich.

- It would appear that this has not been reflected in the Ipswich CS jobs growth figures and raises doubts about the effectiveness of the claimed 'close working' and the risk of double counting.

We appreciate that the Ipswich Northern Fringe is the last remaining greenfield site within the Borough Boundary that could support major housing development but it is not well connected to sites of expected jobs growth, traffic congestion is currently high and as such is unsustainable. The Council has expressed an intention to work with Babergh, Mid Suffolk and Suffolk Coastal District Councils to ensure an optimum sustainable distribution of housing within the Ipswich Policy Area and we would like to see this happen. We feel a better more sustainable solution is possible by prioritising the regeneration of brownfield sites closer to the sites of new employment across the Ipswich Policy Area to meet housing needs ahead of multi-site building on the Northern Fringe greenfield land.

**Recommendation 7** Before developing the Ipswich Northern Fringe, we feel a better more sustainable solution is possible by prioritising the regeneration of brownfield sites closer to the sites of new employment across the Ipswich Policy Area to meet housing needs

Section 17 'Core Planning Principles' of the NPPF states 'encourage the effective use of land by reusing land that has been previously developed (brownfield land)'. A Ministerial Statement has recently reinforced this – see Recommendation 14 below. The proposed removal of the 60% target for development on Previously Developed Land (brownfield) is a negative step. Coupled with the proposed multi-site development of the Ipswich Northern Fringe, we are concerned that the developers will focus on greenfield housing development in preference to brownfield development as it is cheaper and easier for them to do so. This will have a detrimental impact on the regeneration of brownfield sites particularly in the town centre and deprived areas. The Government have recently recognised this general trend across the country and now plan to offer incentives for brownfield development. Also it is worth noting that the number of areas in Ipswich within the most deprived 20% of areas nationally has increased from 19 areas as recorded in the IMD 2007 to 21 areas in 2010. In absolute terms, the number of people living within the most deprived 20% of areas has risen by 2.5% suggesting that Ipswich has become comparatively more deprived since 2007.

**Recommendation 8** Re-instate a target or a small number of time dependent targets for Previously Developed Land to ensure regeneration sites especially in areas of deprivation are given adequate priority over greenfield sites.

**Recommendation 9** If IBC intends to sanction multiple starts across the whole of the Northern Fringe at any one time, the CS must clearly set out this intention and how this will be managed to avoid working against the spatial strategy set out in Policy CS2.

Although the CS mentions issues with water supply and sewage in Ipswich it fails to address these in the key infrastructure requirements. Fresh water and sewage infrastructure should be included since both have previously been identified by the Haven Gateway Water Cycle Study as key issues for Ipswich and are mentioned in the NALEP 2014 Strategic Economic Plan. Paragraph 6.92 of the latter confirms that the scale and cost of major new connections in relation to water supply and wastewater infrastructure (including treatment plant), is currently inhibiting the progress of some strategic sites in Ipswich. Regarding the proposed Northern Fringe development there are still unresolved major issues regarding the transportation of foul water to a sewage treatment plant.

**Recommendation 10** The strategic infrastructure for both fresh water supply and sewage should be included as part of the CS focussed review and included in the Infrastructure tables. Table 8b requires changes to avoid the risk of unintended consequences – see page 18 of this document.

We believe that the CS needs to have a greater focus on improving the lives of existing residents and that a homes-led expansion risks worsening the lives of existing residents. In particular there needs to be increased focus on:

- Raising education standards.
- Helping residents off benefits.
- Getting the long term unemployed back to work.
- Revitalising the town centre.
- Tackling traffic congestion.
- Improving poor health and low physical exercise levels of existing residents<sup>1</sup>.
- Redevelopment to improve the condition of the private rented sector housing stock.<sup>2</sup>

Without increased focus on these issues we believe the CS does not comply with the NPPF, is not sustainable and is unsound.

**Recommendation 11** The CS needs increased focus on improving the lives of existing residents through raising educational standards, helping residents become healthier, get off benefits and into work, revitalising the town centre, redeveloping poor homes, finding a way to kick- start the stalled Waterfront and tackling traffic congestion.

**Recommendation 12** The CS needs to align with the IBC Economic Development Strategy Implementation Plan in recognising the major problem of unfinished buildings on the Waterfront. This area is a major eyesore and prone to anti-social behaviour. We welcome the Council's initiative to set up a steering group to tidy up the sites in preparation for investment options.

We believe there are inconsistencies in the CS car parking policy and ambiguity in relation to the Bury Rd Park and Ride which the Site Allocations DPD assumes will be reopened and enlarged whilst the CS deletes the reference to a new park and ride (Page 74). We note that the proposals for IP-One include an expansion of the existing car park capacity and question the need for this given that the existing long term capacity is rarely insufficient to meet demand, although there are a few pinch points that need to be improved. This is also inconsistent with the aim for more people to walk and cycle into the town centre and the reopening/extension of the Bury Rd Park and Ride as indicated in the Site Allocations DPD.

**Recommendation 13** Further consideration of car parking solutions and the future of the Bury Rd Park and Ride is required as part of the CS review

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<sup>1</sup> The latest Ipswich AMR data show very low levels of regular physical exercise (9.6% adults and 50% pupils in years 1-13 compared to Colchester 14.6% and 74.5% respectively). More worrying is that 14.5% of people are registered with their GP as having depression compared to 4.5% nationally.

<sup>2</sup> The Council's 2005 Private Sector Stock Condition Survey found that 36.9% private sector homes in Ipswich do not meet the decent homes standard, the main reason for failure being thermal comfort with 13.9% having a Category 1 hazard and that 47.8% of vulnerable households live in non-decent homes. Whilst these numbers will have improved, there is clearly a major need to develop existing private sector homes which will help tackle deprivation and health issues.

**Recommendation 14** The CS and associated Sustainability Appraisal must take account of revised Governmental guidance on the NPPF that will be issued following the Ministerial Statement<sup>3</sup> made by Nick Boles on 6<sup>th</sup> March 2014. Changes will include:

- Issuing robust guidance on flood risk.
- Making clear that local plans can pass the test of soundness where authorities have not been able to identify land growth in years 11-15.
- Making clear windfalls can be counted over the whole local plan period.
- Explaining how student housing, housing for older people and the reuse of empty homes can be included when assessing housing need.
- Ensuring that infrastructure is provided to support new development, and noting how infrastructure constraints should be considered when assessing suitable sites.
- Stressing the importance of bringing brownfield land into use.
- Clarifying when councils can consider refusing permission on the grounds of prematurity in relation to draft plans.

These amendments are consistent with several of the concerns we have expressed in our response.

### **Specific comments**

**Page 9 Para 3.3** This paragraph previously stated “Ipswich Borough Council considers that a jobs-led growth strategy is the right one for Ipswich”. This has now been deleted. The revised CS should clearly identify why IBC no longer believes a jobs-led growth strategy is right for Ipswich.

The NFPG has always supported an employment-led strategy. However, we previously argued that the CS was not sustainable and therefore unsound as it was based on job targets that had no supporting evidence base and were clearly unrealistic and unachievable. We are disappointed that IBC has radically shifted its focus from a jobs-led to a housing needs-led strategy despite the former being widely supported by officials, councillors, politicians, businesses and the general public. The change has been made without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed. Whilst appreciating that the National Planning Policy Framework places a new requirement on Local Authorities to ensure their Local Plan (and C S) meets the full objectively assessed needs for market and affordable housing as far as is consistent with the policies set out in the Framework, a key requirement is sustainability. For sustainability we would argue that housing and jobs growth must be in balance to some extent and ideally situated in close proximity with good sustainable transport links.

The implication of new homes being constructed in Ipswich Borough without sufficient new jobs being created will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Neither of these outcomes is sustainable. In particular, one of the main arguments that the Northern Fringe housing development is sustainable is that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. Hence the revised CS is unsound.

**Page 12 Para 5.4** Although it gives us no pleasure in seeing the figures, we are pleased that the employment difficulties in Ipswich Borough have finally been recognised in the CS as this should help focus and deliver successful solutions. However, this contradicts with the first sentence in Para 5.7, which needs to better reflect the current situation and acknowledge the issues of low skills and educational achievement in the workforce as identified in the Suffolk Growth Strategy.

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<sup>3</sup> [http://www.parliament.uk/documents/commons-vote-office/March\\_2014/6th-March/1.%20DCLG%20Local%20Planning%20.pdf](http://www.parliament.uk/documents/commons-vote-office/March_2014/6th-March/1.%20DCLG%20Local%20Planning%20.pdf)

**Page 13 Para 5.8** We are not convinced that that Ipswich's night time economy is strong given the number of club, bar and pub closures. It is poor compared to other county towns such as Norwich and Cambridge and needs to be further supported through the CS and The IBC Economic Development Strategy Implementation Plan. The Waterfront night time economy has generally been a success (although we note the recent closure of the Quayside restaurant/bar) but this has partially been at the expense of the historic town centre night time economy, which has shifted towards the Waterfront. Further support is required to help redevelop Ipswich's night time economy outside of the Waterfront.

**Page 13 Para 5.9** Ipswich does not have strong transport links as evidenced by the continued cross-party lobbying of Government to improve the local rail network and journey times into London etc and the increasing levels of congestion affecting major strategic routes including the A11, A12 and A14 (see also Para 8.13 – 8.29 Suffolk Growth Strategy). The Delivery Plan for the Suffolk Growth Strategy recognise that improvements are urgently required for both rail and road infrastructure in its proposed actions 16 and 17. These are also referred to in the NALP 2014 Strategic Economic Plan – see our comments regarding Page 74. The CS needs to do likewise, especially as we know that the Council supports these improvements.

We share the concerns raised in this Delivery Plan and note that rolling stock is largely antiquated and obsolete without wireless access/power sockets etc and trains still dump untreated sewage on the lines and trackside. Train services going through Westerfield and Derby Road stations have also been cut and there has been recent unfavourable press and comment by the County Council's Transport Portfolio Holder on the unreliability of the Felixstowe to Ipswich rail service<sup>4</sup>. Until these issues have been corrected, it is untrue to describe Ipswich as having strong transport links. This is important in terms for the CS as more people have to commute out of Ipswich Borough to find work.

Although the Travel Ipswich scheme is not fully implemented, there are concerns whether the scheme is actually working. The traffic lights appear to be slowing down traffic flows. Until the system has demonstrated its effectiveness no more roundabouts should be replaced with traffic lights in Ipswich. The CS should reflect these issues although we recognise that IBC is not the Highway Authority.

The 2014 Cities Outlook report<sup>5</sup> ranks Ipswich as the 48<sup>th</sup> most congested city out of 56, showing that congestion is already a major issue, which will only get worse with increased housing - especially as people will be forced to commute to sites of new employment.

**Page 13 Para 5.10** The table casts doubt on IBC's employment growth forecasts and target as being heavily over-optimistic and impossible to deliver. The Ipswich population increased from 128,000 (2007) to 133,384 (2011), whilst the numbers of Ipswich residents in employment decreased from 67,310 to 63,500 with unemployed up from 5.3% to 9.7%. This shows that an over-reliance on national based models, especially without sufficient consideration of local issues, is flawed. The latest data needs to be included e.g. NOMIS Oct 12-Sept 13 and EEFM August 2013 data.

We are also concerned that levels of deprivation are increasing in parts of Ipswich and that average salaries have fallen substantially. The CS needs to recognise this so that effective policies to improve the situation can be developed and implemented.

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<sup>4</sup> [http://www.ipswichstar.co.uk/news/felixstowe\\_where\\_have\\_all\\_our\\_trains\\_gone\\_passengers\\_lose\\_faith\\_in\\_rail\\_service\\_1\\_3295413](http://www.ipswichstar.co.uk/news/felixstowe_where_have_all_our_trains_gone_passengers_lose_faith_in_rail_service_1_3295413)

<sup>5</sup> [http://www.centreforcities.org/assets/files/2014/Cities\\_Outlook\\_2014.pdf](http://www.centreforcities.org/assets/files/2014/Cities_Outlook_2014.pdf)

The table does not show all the text that has been deleted in relation to “Top Employment Sectors”. We also note that the revised CS does not show that Map 2 has been deleted. We are sure this is accidental but would welcome a review of the revised CS to ensure that other omissions have not occurred.

**Page 14 Para 5.12** The CS needs to align with the IBC Economic Development Strategy Implementation Plan in recognising the major problem of unfinished buildings on the Waterfront. This area is a major eyesore and prone to anti-social behaviour. We welcome the Council’s initiative to set up a steering group to tidy up the sites in preparation for investment options.

**Page 14 Paras 5.17 and 5.18** We are concerned that the expansion of UCS is suffering from a slowdown. In December 2013, UCS announced it would be making staff cuts after failing to attract enough students with about 4,500 people enrolled at UCS, compared to a target of 7,500 students by 2015. We are pleased to hear that applications have increased for 2014 entry with applications from outside the region increasing by 2%. We welcome IBC’s initiatives to grow jobs through transferring knowledge and skills from UCS and establishing a Waterfront Innovation Park enterprise zone but suggest more support is required for UCS especially, as we note that the EEFM 2013 forecasts show a reduction in education employment for the Borough.

**Page 16 Para 5.26** It is important to recognise levels of deprivation in Ipswich in the revised CS and how these are changing in order to develop and implement effective policies to tackle this major issue. The revised CS fails to consider the implications of a shift to a housing-led strategy resulting in a larger local workforce competing for a relatively smaller number of jobs on lower salaries. Lower average salary levels will inevitably result in higher levels of deprivation and poverty with associated health implications especially in relation to increased fuel poverty. Unless property prices fall to mirror lower average salaries, homes will become even less affordable. Additional focus on tackling deprivation, getting the long term unemployed back to work and helping residents off benefits is required in the revised CS. We note that according to the latest UK Peace Index<sup>6</sup> (which measures indicators on Homicide, Violent Crime, Weapons Crime, Perceptions of Crime and Police Officers) Ipswich is one of the worst rated areas in the East of England. The Peace Index is strongly linked to deprivation in income, employment opportunities, health and disability, education and housing. Housing growth must be balanced with employment growth to improve this index and the lives of Ipswich residents.

**Page 17 Para 5.31** This fails to mention what growth is taking place. Over the past decade we have seen housing growth and population growth without jobs growth. The CS needs to clarify that there is ‘forecast growth’ in both the population and the economy and not treat this as an undisputed fact.

Although we appreciate that IBC is not the Education Authority, the CS needs to recognise the relative poor performance of some Ipswich schools in the league tables in order to help raise standards.

**Page 20 Para 6.7 d, Page 74 last bullet point Policy CS17 and Page 110 Policy DM18** We believe there are inconsistencies in the CS car parking policy and ambiguity in relation to the Bury Rd Park and Ride which the Site Allocations DPD assumes will be reopened and enlarged whilst the CS deletes the reference to a new Park and Ride (Page 74). We note that the proposals for IP-One include an expansion of the existing car park capacity and question the need for this given that the existing long term capacity is rarely insufficient to meet demand, although there are a few pinch points that need to be improved. This is also inconsistent with the aim for more people to walk and

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<sup>6</sup> <http://www.visionofhumanity.org/#/page/indexes/uk-peace-index>

cycle into the town centre and the reopening/extension of the Bury Rd Park and Ride as indicated in the Site Allocations DPD.

We agree with Ipswich traders that the main issues with car parking are the cost and the difficulty in travelling into the town centre. We support IBC's "Quids In" scheme, which helps address the cost of parking. IBC's proposal to provide more car parking capacity will not address either of these issues. A better solution would be to reopen the Bury Rd Park and Ride, which the Council states it is committed to in the Site Allocations DPD. In parallel a specific review of the need and type of car parking is required. We believe that some of the surplus long term parking could then be switched to short term parking, thus removing the need for further expansion and freeing up land for other uses. The traffic impacts of encouraging more short journeys in and out of the town centre need to be further assessed, most notably with regard to the impact on AQMAs/air pollution and congestion.

We believe further consideration of car parking solutions and the future of the Bury Rd Park and Ride is required as part of the CS review and Site Allocations DPD. A consistent position is required across the two documents.

**Page 21 Para 6.8 bullet 3** The housing growth target of at least 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring Local Authorities to make up the shortfall of 4,611 dwellings (Paragraph 8.83 last sentence refers).

We support the efforts that the Council has made in using existing models and forecasts and in commissioning the Research and Geospatial Information team of Luton Borough Council to produce Population and Household projections for Ipswich and the surrounding Local Authorities. However, there are a number of flaws in these forecasts, which we discuss in detail in comments on Policy CS7 below.

IBC should revisit the Ipswich Population and Household projections and revise the population and household targets giving proper consideration to the DCLG 2011 data and the latest data including that from the ONS, the EEFM models and by incorporating the 2011 Census Commuting numbers expected in March 2014. Evidence shows that the current Trend Migration scenario is flawed for Ipswich Borough and should be rejected. Economic migrants will be attracted to places with good salaries, relatively low rental costs and nearby jobs. As such they will be more attracted to neighbouring authorities than Ipswich Borough.

With the proposed removal of the 60% target for development on Previously Developed Land (brownfield) coupled with the proposed multi-site development of the Ipswich Northern Fringe, we are concerned that the developers will focus on greenfield housing development in preference to brownfield development as it is cheaper and easier for them to do so. This will have a detrimental impact on the regeneration of brownfield sites particularly in the town centre and deprived areas. We recommend that a target or a small number of time dependent targets for Previously Developed Land be re-instated to ensure regeneration sites are given adequate priority over green field sites.

There is a need to define "larger sites" to avoid ambiguity.

We would welcome a specific jobs target for Ipswich but the aspiration of "up to 12,500 jobs" is meaningless as this could be achieved simply by the creation of a single job! IBC is showing commitment to achieving jobs growth in Ipswich through its Economic Development Implementation Plan but needs a firm target to be able to drive forward this plan.

The Core Strategy can be made more sound by including a firm jobs growth target for Ipswich between 2011 and 2031 and this can simply be achieved by deleting the words 'up to' in Section 6.8 bullet 3b and other occurrences within the Strategy. The target of 12,500 jobs will need revision in the light of more up to date evidence e.g. the 2013 run of the East of England Forecasting Model, the 2011 Census commuting data expected in March 2014 and local knowledge of the Ipswich jobs market. The target needs to make clear that it is for the Borough of Ipswich and not the Ipswich Policy Area.

**Page 21 Para 6.8 bullet 4** We agree with this objective but note that the largest area of development is in fact the Ipswich Northern Fringe and this is outside the IP-One area. This needs to be corrected.

**Page 22 Paras 6.10, 6.11 and 6.12** We support this approach but unfortunately the CS will not deliver these aims. By allowing multiple starts across the entire Northern Fringe for housing development and removing the target to develop brownfield sites there will be a major detrimental impact on regeneration of brownfield sites in deprived areas. Developers will focus on new housing on greenfield sites as it is cheaper and easier for them to do so. Clearly the priority should be to develop brownfield sites, especially those in more deprived areas, which is a far more sustainable approach. As drafted the CS will fail to regenerate such areas.

**Page 23 Para 6.17** Comments as Page 22.

**Page 24 Para 6.18** We agree that the Central shopping area boundary should be redefined for example to extend to the Waterfront but also believe that other rundown parts of the Central shopping area can be regenerated far better through the provision of new homes. We question the demand/need for a new Westgate shopping centre.

**Page 24 Para 6.19** Whilst we would encourage and support IBC in its efforts to grow jobs in Ipswich through its Economic Development Implementation Plan, and Suffolk County Council through the Suffolk Growth Strategy, we notice that Ipswich Town Centre has not been included as a principle location for economic growth. The only principle growth site within the Ipswich boundary is the A14/Ravenswood/Futura Park/Ransomes Euro park expansion. The next two nearest sites are the Former Sugar Beet Factory and Adastral Park. None of these are within easy reach of the proposed Northern Fringe housing development by public transport or other sustainable transport means and commuting by car would seem inevitable. The Suffolk Growth Strategy identified Finance/Insurance as a growth industry for Ipswich and this should be mentioned in the CS even though the predicted growth from 2011-2031 by the EEFM 2013 data is a modest 428 jobs i.e. 7%.

**Page 25 Para 7.2 bullet iii** Allocates the entire Ipswich Northern Fringe for development and our comments regarding page 22 also apply here. Urban regeneration and improving more deprived areas will be facilitated by limiting development on the Northern Fringe during the early years of the CS. Whilst we welcome the Government's recent announcement to offer incentives for the development of brownfield sites, we believe some form of restriction should be retained to help achieve regeneration/deprivation and sustainability objectives (i.e. Section 8.6).

**Page 27 Para 8.6** We note that a key policy thrust of the plan is to achieve 'genuine sustainable development in delivering growth' but question whether the development of the Ipswich Northern Fringe could ever be considered sustainable due to its poor location with respect to centres of jobs growth and the need for residents to commute to work.

**Page 28 Para 8.11** In order to be sustainable and be a "comprehensive approach" as stated, Policy CS1 should also include an objective to reduce carbon emissions from travel in Ipswich. Although, we

note that travel is addressed elsewhere in the CS, this is a glaring omission and without this Policy CS1 is clearly not “comprehensive” and is therefore unsound.

**Page 31 Para 22** Although the CS mentions issues with water supply and sewage in Ipswich it fails to address these key issues preferring to focus upon SUDs for managing water run-off. Fresh water and sewage infrastructure should be included since both have previously been identified by the Haven Gateway Water Cycle Study as key issues for Ipswich and mentioned in the NALP 2014 Strategic Economic Plan. Paragraph 6.92 of the latter confirms that the scale and cost of major new connections in relation to water supply and wastewater infrastructure (including treatment plant), is currently inhibiting the progress of some strategic sites in Ipswich. See our comments regarding pages 137-140,

**Page 33 Para 8.27** We agree with the statement that “The second vital element of sustainable development is where to locate new development so that people can easily access the jobs, goods and services they want and need, by the most sustainable modes of travel.” Evidence indicates that the majority of new jobs will not be created in the town centre. The CS is unsound in that the Northern Fringe is not located within easy access of the major new centres of employment and residents will need to commute either to the new centres of employment outside of the Borough or to the other side of town as there is no direct public transport available and it is too far to walk or cycle for most people. In addition multi-site development of the entire Northern Fringe from the outset will work against the plan's spatial strategy set out in Policy CS2 by undermining urban regeneration efforts.

Policy CS2 also states that the Council will “focus[ing] major new retail development into the Central Shopping Area”. However, this has not been the case as the only major retail development since the adoption of the Core Strategy has been at Futura Park.

**Page 33 Para 8.28** states, “This approach to the location of development is centred primarily on the town centre (which includes Ipswich Village and the Waterfront), and secondly on the town's district centres. The CS is unsound as it will fail to achieve this objective as residential developers will now focus on the Northern Fringe, as it is easier and cheaper to do so ahead of brownfield sites due to the proposed multi-site development across the entire Northern Fringe from the outset. Developers of new office and retail facilities will also favour out of town locations with good access to the A12 and A14, as shown by the successful development of Futura Park and Ransomes Europark. These sites have been identified by Suffolk CC, working with the local authorities, as major areas for the creation of new jobs in its Growth Strategy, unlike Ipswich town centre. However we support IBCs intentions to develop and regenerate the town centre and to attract new employment opportunities as indicated in the IBC Economic Development Strategy Implementation Plan. With regard to the latter we note and support IBC's intention to ‘bring forward high quality A Class business premises along the corridor between the rail station and town centre’.

**Page 36 Para 8.40 bullet b Policy CS3** We object to the deletion of the text from “b. Allocate sites for development in IP-One ~~including land to provide approximately 2,000 dwellings;~~” as this further reduces the commitment to building new homes in IP-One. We believe a target should be reinstated and that this should then be designated a priority to help regeneration.

**Page 42 Policy CS5** We support this policy. However locating new homes in Ipswich without new jobs for residents within the Borough or near to new sites of employment will breach this Policy. Locating 3,500 new homes on the Northern Fringe will force people to commute to centres of new employment. As there are no existing or proposed direct bus routes this will mean they will travel by car. This is clearly not sustainable and in breach of this Policy. Therefore the CS is currently unsound.

**Page 42 Para 8.65** We support well-designed efforts to reduce congestion in Ipswich but note that the Travel Ipswich scheme has yet to demonstrate that it will work. Although the system is not yet fully implemented residents have major concerns especially as the traffic lights are slowing down traffic flows. The CS should commit to no further works, especially the replacement of roundabouts with traffic lights, until the system has demonstrated its effectiveness.

**Page 43 Para 8.69** We agree that the IPA Board should be an important body, especially given the duty to cooperate. We were very disappointed that the Board failed to meet for 12 months prior to November 2013. Greater co-operation and working together between authorities is required in relation to the identification and delivery of the best employment and housing sites across the area. This should have happened before this consultation or the CS was commenced. Clearly in order to be sustainable the location of new homes must be near to the location of new jobs, especially given the current travel problems in Ipswich. The proposed re-activation of the Board should address this as a priority. The work of the IPA Board must feed into this CS review and as such the revised CS should not be agreed beforehand.

**Page 43 Paras 8.72-8.75** These paragraphs need to clearly state that IBC will work more closely with neighbouring authorities than it has done recently. It is simply not acceptable for the IPA Board not to have met for 12 months. We are pleased that there now appears to be a commitment for closer working as required under the NPPF but would like to see a commitment to a minimum number of annual meetings/work programme etc within the CS. It may be appropriate to jointly develop plans for the location and numbers of new homes, which should be closer to where the new jobs are being created for example along the A12/A14 corridor to allow more sustainable travel. This will allow optimal planning and prevent the current risk of double-counting in relation to jobs/homes targets.

An inspection of the jobs growth forecasts from the Babergh, Mid Suffolk and Suffolk Coastal Core Strategies and the IBC CS Focused Review show:

- The combined CS forecast jobs growth is 38% higher than the total forecast by the EEFM August 2013 data across these authorities. There is a major risk that the individual jobs targets of each local authority are unrealistic when compared to the total potential across the four authorities.
- The higher growth is mainly due to significant differences being forecast by both Babergh and Mid Suffolk CSs compared with the EEFM forecast. In the case of Babergh the EEFM jobs growth forecast from 2011 –2031 is 2545 jobs whereas the CS forecast is 9700 jobs i.e. a difference of 7155 jobs, or in other words 3.8 times as many jobs! For Mid-Suffolk the EEFM forecasts 4400 new jobs whereas the CS 11100 jobs i.e. 6700 more or 2.5%.
- According to Babergh, part of the rationale behind this major difference in forecast jobs growth is that some of the economic growth needed for Ipswich Borough (which is tightly constrained by its boundaries) needs to fall within its larger neighbouring districts. That is, there is an expectation that more Ipswich residents will commute to employment sites outside of Ipswich.
- It would appear that this has not been reflected in the Ipswich CS jobs growth figures and raises doubts about the effectiveness of the claimed 'close working' and the risk of double counting.

**Page 45 Policy CS7** The Amount of Housing Required. We support the efforts that the Council has made in using existing models and forecasts and in commissioning the Research and Geospatial Information team of Luton Borough Council to produce Population and Household projections for

Ipswich and the surrounding Local Authorities. However, the Sustainability Appraisal/SEA process requires an examination of the baseline information of the Borough 'as it is now' together with data on 'how it may change in the future'. The CS and its SA must therefore be based on the best data available, which is not the case at present. There are a number of flaws in the forecasts and these include:

- The data is not up to date e.g. the East of England Economic Forecasting Model (EEFM) data used was for the September 2012 run, instead of the 2013 EEFM run (the latter but not the former having 2011 Census data) and the latest ONS data has not been used. As an example the ONS international migration data used in the study only went up to 2011 and used an average of the past 5 years with the net gain decreasing in recent years to just nine in 2010/11. The latest data shows 2011-2012 continued this trend by going negative (-500), which changes the 5 year average net international migration used in the model projections from 283 per year to 157 per year. This has a significant effect on the outcome as it is below the low migration scenario, which IBC considered and rejected as unlikely. This clearly shows that the Trend Migration scenario is flawed and should be rejected.
- The DCLG's 2011 household projections were not given appropriate consideration and appear to have been dismissed on the basis that the figures were calculated during the recession. However, the figures are reasonably up to date being released on 9<sup>th</sup> April 2013, include the 2011 Census data unlike the EEFM 2012 results, and come with a government endorsement: "The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. " "Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence." Although the projections only go up to 2021 the results can be easily extrapolated to 2031 with an almost perfect correlation.
- The Ipswich household data of 58,700 does not accord with the 2011(April) Census value of 57,300 nor the corresponding 2011 mid year figure produced by DCLG of 57,433.
- The predicted growth in households is out of balance with the predicted growth in jobs. From the EEFM 2013 data the ratio of jobs per household for 2011 (i.e. Census Year) was 1.1 and so one might expect a jobs growth of approximately 15,000 would be necessary to achieve a balance. The unemployment rate is currently high in Ipswich (Page13 CS gives 9.7% for March 2013- NOMIS) and clearly some jobs growth could be accommodated through reducing unemployment, which would be a desirable goal. It is also higher than in neighbouring authorities.
- The table below shows Ipswich population and jobs forecast for both the EEFM 4<sup>th</sup> September 2012 data as used in the CS Review and the more recent 30<sup>th</sup> August 2013 data.

	<u>1991</u>	<u>2001</u>	<u>2011</u>	<u>2021</u>	<u>2031</u>	EEFM Run
Population	118.6	117.2	133.7	149.4	163.4	2013
		117.2	129.7	141.7	155.1	2012
Ipswich based jobs	71.5	73.2	72.9	79	84.3	2013
		72.8	74.5	82	87.2	2012
Residents employed (anywhere)	no data	54.1	63.2	68.4	71.4	2013
		54.1	57.9	63	66	2012
% residents employed		46%	47%	46%	44%	2013
		46%	45%	44%	43%	2012
Net commute		11.8	2.3	2.5	4.2	2013
		11.8	9.2	10.9	12.5	2012
Difference in net commute		0.0	-6.9	-8.4	-8.3	

The population of Ipswich fell slightly between 1991 and 2001 whilst the number of jobs increased slightly. Over the next decade we witnessed an unprecedented housing boom in Ipswich, where houses were built at 3 times the historic rate, and as a consequence the population grew by 16.5k to 133.7k. Unfortunately the number of jobs did not grow but fell slightly to 72.9k according to the 2013 data. What appears to have happened is that the housing boom sucked a large number of people into Ipswich who then found employment outside of the town and this is reflected in the net commuting figures falling from 11.8k in 2001 to 2.3k in 2011, i.e. a fall of 9.5k. Notice the major difference between the net commuting figures of the EEFM 2012 and 2013 results. This can be explained by a correction taking place through the application of the 2011 Census data and highlights the uncertainty of long term forecasting. Of course one possible explanation is that a large number of the people who commuted into Ipswich in 2001 have either moved into Ipswich or their jobs have been taken by residents, but this is considered not significant particularly in view of the increased traffic flowing both into and out of Ipswich during peak times. The 2011 Census data on commuting patterns should be available during 2014 (IBC think March) and this should shed further light on the situation. If it shows that people attracted to Ipswich ended up working elsewhere then it lends support to the argument that on sustainability grounds housing growth should be co-located as far as practical with centres of employment growth. Also see comments regarding page 43 para 8.72 above.

The table below has been extracted from the above. Over the past 20 years jobs in Ipswich have grown at 70 per year whereas the EEFM models are forecasting that over the next 20 years they will grow approximately 9 times as fast! In a similar vein the EEFM 2013 data is forecasting the population of Ipswich will grow at double the rate that has occurred over the past 20 years. A key question must be 'are these forecasts plausible or sustainable'. We would argue they are not. On examining the jobs growth data it becomes apparent that the key driver is population growth consumer services such as retail (32% of all new jobs) and services linked to general employment. There appears to be little growth attributed to national and international services such as finance & insurance, manufacture, agriculture, technical & professional services etc.

Average new jobs created in Ipswich 1991-2011	70	per annum
Average forecast new jobs 2011-2031(EEFM 2013)	570	per annum
Average forecast new jobs 2011-2031(EEFM 2012)	635	per annum
IBC CS up to 12,500	<625	per annum

Whilst we have a certain sympathy for both IBC and Suffolk County Council in interpreting forecasts from expert groups such as Oxford Economics, they need to gain a better understanding of what lies behind the forecasts and add local knowledge rather than accepting the data as fact.

- The SHMA and EEFM 2012 forecasting model are based on DCLG 2008 data, which the SHMA acknowledges in Paragraph 8.21.1 "over-estimates past trends as well as overall population". As a consequence these inevitably reflect the unprecedented population growth in Ipswich brought on by an unsustainable economic and housing boom that we all know resulted in major GB recession. It is inevitable that such models predict a continuing trend of population growth coupled with housing growth, which is also likely to prove unsustainable and therefore unsound. It raises the question as to whether IBC is actually assessing the needs of the local housing market or just creating an unsustainable insatiable demand unmatched to jobs creation?
- As suggested in the NPPF, greater account of the longer term population and job trends in Ipswich need to be taken into account in IBC's forecasting rather than reliance on models

that are based on national and/or regional trends that have been shown to be unsustainable.

- The EEFM 2013 data shows that occupancy rates are stabilising and projects that an average of 2.33 people per household for 2011 will only fall to 2.30 in 2031. The SHMA and housing forecasts need to take account of this accordingly.
- We also note that the population forecasts will have reflected the large growth in UCS student number in Ipswich, which are now far lower than forecast. The current forecasts also do not take account of the effects of the “bedroom tax” and proposals to restrict housing benefits to over 25s, which will all depress demand for new homes.
- We note that Popgroup’s household constrained scenario based on Trend Migration (which we have shown to also be an over-estimation as well as the DCLG 2008 effects) that the Ipswich HMA will still have a net surplus of homes in 2021. This brings into question the level of need for new homes in the Borough.
- The Ipswich AMR also shows that the number of empty homes in Ipswich has increased from 2.2% (2010) to 3.3% in (2011) and on the 24<sup>th</sup> April 2012 had risen further to 2.075 from 1,918 (2011). Of these 685 have been empty for over 6 months, which is obviously not sustainable. This rise is greater than that experienced in Suffolk as well as regionally and nationally. Ipswich has a higher proportion of vacant dwellings than neighbouring Colchester and is also higher than regional and national averages. Authorities are required under the NPPF to bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. We are pleased that the Council has started to tackle this issue but needs to rapidly step up its efforts. The CS should therefore contain a target for bring back empty homes into use. The level of empty homes needs to be taken into account when assessing housing needs.

IBC should revisit and revise the population and household targets giving proper consideration to the DCLG 2011 data, the latest data including that from the ONS and the EEFM models, by incorporating the 2011 Census Commuting numbers expected in March 2014 and taking into account local factors. It should aim to achieve a better and more sustainable balance between these two targets.

**Page 47 Para 8.83** We note that the housing growth target of at least 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring Local Authorities to make up the shortfall of 4,611 dwellings.

**Page 53 Para 8.102 Policy CS9** We do not support the removal of the PDL target. Allowing multi-site development across the entire Northern Fringe from the outset and removing the PDL target will result in new homes mainly built on the greenfield land of the Northern Fringe as it will be cheaper and easier for developers to do so when compared with brownfield land. This will limit the regeneration of the town, especially the town centre, which is undesirable. We would like to see a target or a small number of time dependent targets for Previously Developed Land reinstated to ensure regeneration sites are given adequate priority over green field sites. As drafted we fail to see how the Policy will “focus development on previously developed land first”.

**Page 54 Para 8.108** Parts of the Waterfront regeneration have indeed been successful but in its entirety the regeneration of the Waterfront cannot yet be described as successful as there are large derelict buildings and half-finished buildings that are a major eyesore and subject to anti-social behaviour (please see our comment on Paragraph 5.12). We welcome the Council’s initiative to set up a steering group to tidy up the sites in preparation for investment options.

**Page 54 Para 8.109** Whilst we acknowledge the Ipswich Northern Fringe is the last remaining greenfield site within the Borough boundary that could support major housing development it is not well connected to sites of expected employment growth. IBC should have proactively explored with its neighbouring Local Authorities alternative more sustainable solutions. The Core Strategy must clearly set out the intention to allow multiple starts across the whole of the Northern Fringe at any one time if it intends to do so. Currently this is not obvious and will mislead the general public as they have previously always been told that this will not happen. Multi-site development of the entire Northern Fringe from the outset will work against the plan's spatial strategy set out in Policy CS2 by undermining urban regeneration efforts.

We strongly object to allowing multiple starts across the entire Northern Fringe from the outset as this will detrimentally impact on the building of new homes on brownfield sites as it is cheaper and easier to build on greenfield land. This will result in a breach of Policies CS2 and CS3 rendering the CS unsound. We do not believe that this is the Council's intention but as drafted the CS risks unintended consequences that need to be better guarded against in the CS, for example :

- A large number of separate sites being developed at the same time creating major disturbance for nearby residents.
- Piecemeal locational development scattered across the Northern Fringe that is not physically joined up.
- Piecemeal locational development that does not allow the creation of an appropriate bus route serving the site or seamless cycle/walking routes.
- A large number of unfinished sites if there is a downturn in housing demand for any reason.
- Some existing residents being subject to major noise and disturbance over a lengthy and extended period.
- New residents of the Northern Fringe also being subject to major noise and disturbance over a lengthy and extended period – this could also apply to schools sites which could be surrounded by ongoing development over many years.
- Road safety concerns regarding multiple access routes to multiple sites as the Northern Fringe becomes populated especially as schools become operational. This is especially the case with the high school, where we have a larger catchment area than just the Northern Fringe. Northgate is already at capacity and is unlikely to absorb the additional capacity created by both St Margarets and Rushmere schools which have each created an additional entry stream. Young adults from Ormiston Academy are also likely to attend the sixth form as it will be the nearest to them.
- Potential damage to new roads and landscaping due to access requirements to multiple sites over many years.
- High likelihood of deliveries arriving at the wrong site, which would increase congestion, disruption and the risk of accidents.

We note that the Northern Fringe SPD proposes controlling these risks as outlined in its "Approach to development sequencing" and "Implementation, Delivery and Monitoring" in Chapter 7. This is clearly the intention of IBC so we urge that these requirements, especially the proposed development sequencing and the requirements in Paragraph 7.31, are also included in the CS for completeness and clarity. The development sequencing of the Northern Fringe needs to be reviewed once the housing needs and target figures have been reassessed using recent data.

We also advocate that restrictions are placed on the number of sites operated by any one developer at any one time. We suggest that this be limited to one main operational site per developer at any one time although these could be staggered as one site nears the end of development. This would clearly result in a more sustainable approach to the development of the Northern Fringe by better managing the issues associated with multi-site development.

The Northern Fringe land allocations should clearly show the allocation for Sustainable Urban Drainage (SUDs) since this forms a key aspect of the design and will impact on both housing densities and the amount of housing.

Policy CS10 needs to set out a specific area (size not location) required for outdoor sports facilities in the Ipswich Garden Suburb and this needs to be calculated bearing in mind recent population growth forecasts for Ipswich. According to Section 3.16 of the Ipswich Garden Suburb Supplementary Planning Document, 'Sports Pitch provision of 12ha is required to comply with Core Strategy Appendix 6' but only 5.5ha is allocated for 'formal open space to include sports pitches'. It is proposed that part of the deficit can be overcome through the shared community use of sports facilities at the Secondary and Primary Schools. It is not clear how successful or acceptable this arrangement would be particularly for the community, as schools would have priority not just during school hours but for after school activities. Ipswich already has a deficit in outdoor sports provision particularly in the North and Central Areas and the above proposal will make the situation worse. In view of the high population growth forecasts we recommend the sports pitch provision is reassessed and that a specific area allocation made.

**Page 56 Para 8.109 bullet b** We do not support this change as it weakens the requirements and it is not clear what exactly "amplify" means in this context.

**Page 56 Para 8.109** Bullet d. needs to "set out the sequencing of housing and infrastructure delivery required for the development" and not just "provide guidance". This would improve clarity.

We would like to see a deadline for the agreement of the Northern Fringe SPD. Ideally, we would like this to be at the same time as agreement of the revised Core Strategy.

**Page 56 Para 8.111** We note and support this intention but would point out that if this had happened earlier more sustainable solutions may have been agreed in preference to developing the Ipswich Northern Fringe, closer to employment growth sites and on lower grade agricultural land.

**Page 62 Para 8.138** This should specifically mention the jobs target for Ipswich as well as the reference to Ipswich Policy area as this is the main focus of the Core Strategy in relation to work.

**Page 62 Para 8.141** The "wider Ipswich Area" needs to be defined otherwise this is confusing.

For reasons we have stated earlier, it is essential that "housing growth in Ipswich is **matched** by employment growth". We strongly object to this proposed change and the proposed deletion of the words 'The town cannot support a growing population without commensurate change in the level of accessible jobs provision.'

We are pleased that the Council has finally decided to focus on the delivery of jobs within the Borough rather than just the Ipswich Policy Area, something we have always argued for. However, we would like to see a firm target rather than "in the region of 12,500 jobs" to help clarity. For instance, would a shortfall of 5, 10 or 20% be considered a success? We note that this is different to the target stated earlier of "up to 12,500 jobs".

**Page 63 Para 8.143** We welcome that IBC is aiming to align its jobs growth strategy to the Suffolk Growth Strategy. This paragraph should also mention alignment with the New Anglia LEP Strategic Economic Plan and European Investment Strategy and also the recently Government approved Greater Ipswich City Deal.

**Page 63 Para 8.145** Table 5 should be retained but the latest jobs growth estimates from 2011 to 2031 included. Shown below is a revised Table 5 with the initial columns using the EEFM August 2013 data listed in descending order of the number of jobs predicted to grow from 2011 – 2031.

For comparison purposes we have included the EEFM 2012 figures, which are summarised in the IBC Employment topics paper. Although the top two employment growth sectors (Professional & Technical Services and Business), on a percentage basis, remain the same it will be noticed that there is considerable change in the growth rates of the subsequent sectors. In particular, it is seen that the forecast for retail is widely different with the 2013 EEFM forecast for new jobs in 2031 being over twice the 2012 EEFM forecast. Of course, EEFM 2013 figures have an additional year of actual data, which might explain some of the difference.

Large differences can also be seen in Professional & Technical Services, Construction, Employment Service, ICT and Real Estate. It is salient to observe how one run of the EEFM from one year to the next can result in such widely different forecasts and illustrates the degree of caution that needs to be placed on such long range forecasts. However it should be borne in mind that the EEFM relies heavily on published data with the official source of employment estimates being derived from the 'Business Register and Employment Survey' (BRES). Note that it is a survey and one survey can differ substantially from another. Longer term historic growth trends for the creation of new jobs need to be better considered when assessing future growth scenarios as these smooth out the effects of "boom and bust".

Industry Sector	EEFM 30th August 2013			EEFM 4th September 2012		
	Ipswich Jobs		%Change	Ipswich Jobs		%Change
	2011	2031 Change	2011-2031	2011	2031 Change	2011-2031
Retail	7,768	3,613	47%	8,172	1,530	19%
Professional & Technical Services	2,842	1,926	68%	3,855	2,403	62%
Business	2,542	1,409	55%	2,551	1,251	49%
Health & Care	12,203	1,193	10%	12,613	2,036	16%
Accommodation & Food	3,765	1,005	27%	4,233	775	18%
Transport	4,242	805	19%	4,270	695	16%
Construction	3,868	778	20%	3,444	1,362	40%
Arts & Entertainment	2,302	776	34%	2,396	1,045	44%
Employment Services	2,266	672	30%	2,467	1,225	50%
Finance & Insurance	6,347	428	7%	5,411	294	5%
ICT	1,944	380	20%	1,909	84	4%
Real Estate	884	347	39%	1,121	654	58%
Wholesale	3,801	245	6%	3,787	588	16%
Agriculture	53	-12	-23%	56	-14	-25%
Other	1,968	-101	-5%	2,509	262	10%
Education	6,882	-309	-4%	6,646	131	2%
Utilities	1,280	-310	-24%	750	-193	-26%
Public Administration	4,747	-694	-15%	5,364	-385	-7%
Manufacturing	3,196	-714	-22%	2,907	-1000	-34%
Totals	<b>72,900</b>	<b>11,437</b>		<b>74,461</b>	<b>12,743</b>	

It can also be seen that the Ipswich main growth sectors do not align well with the priority jobs growth sectors identified in the NALEP 2014 Strategic Economic Plan shown below:

**3.13** Our priority sectors for intervention are those that have high GVA potential, key assets to exploit and where growth would not occur 'naturally'; these are:

- Energy (including low carbon)
- Advanced manufacturing/engineering
- Food and agri-tech
- Life Sciences
- ICT and Digital Creative

4.6 Continued support will be provided to the following current sector priorities:

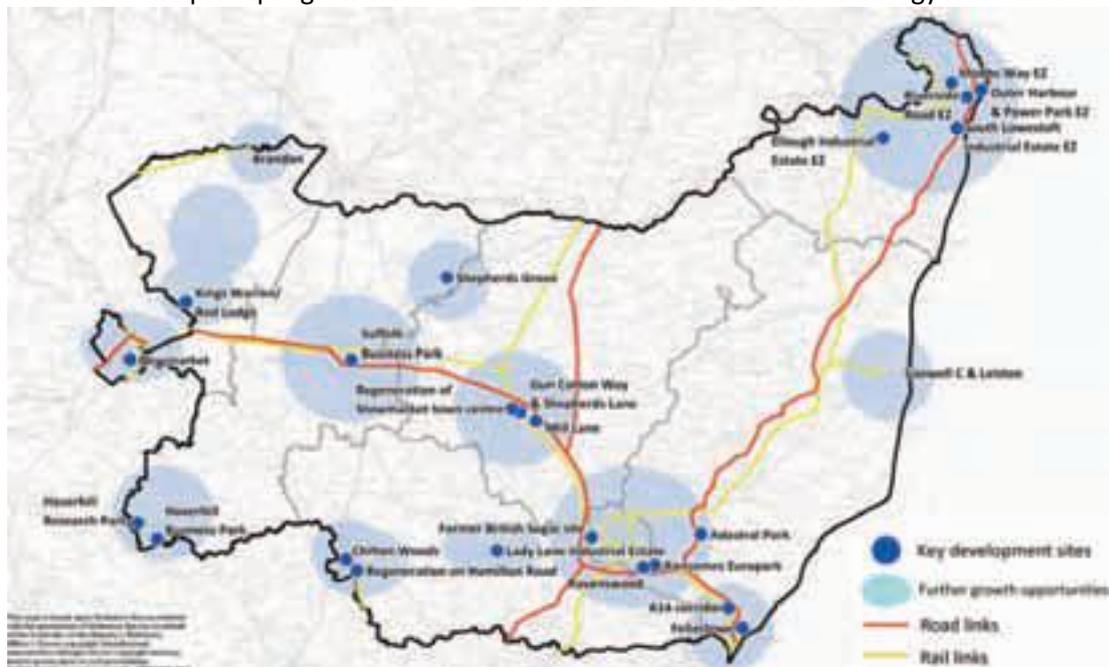
- Tourism
- Culture
- Finance and Business Services
- Ports and logistics

**Page 64 Para 8.146** Although we believe it right for IBC to support the growth sectors identified in both the Suffolk Growth Strategy and the NALEP 2014 Strategic Economic Plan it is also vitally important to focus on the top growth sectors identified for Ipswich, which are different. This needs to be made clear in the Core Strategy to ensure it gets translated into both the Ipswich Economic Strategy and the Ipswich Economic Development Strategy Implementation Plan. The key sectors that appear not to be adequately reflected in the latter are:

- Business Services.
- Professional & Technical Services.
- Health & Care.

**Page 65 Para 8.149** Whilst we support that the site encompassing ‘Ransomes Europark /Ravenswood/Futura Park’ has been recognised by the Suffolk Growth Strategy as a principle site for economic growth in Ipswich we are disappointed that it is the only site identified in Ipswich. We are particularly disappointed that the town centre has not been identified since there is a pressing need for regeneration and jobs growth in the town centre and the jobs growth focus will lie elsewhere. In view of the local expertise in the Insurance industry we feel far more needs to be done to attract investment and new jobs into Ipswich town centre to meet and possibly exceed the EEFM forecasts for this sector. We suggest this sector be given a greater priority by IBC and note that it is given a mention in the Suffolk Growth Strategy.

The location of the principle growth sites identified in the Suffolk Growth Strategy is shown below.



None of the growth sites identified are easily accessible from the Ipswich Northern Fringe by public transport and since the main jobs growth is not in the town centre increased traffic congestion will arise. The diagram illustrates why housing growth in the poorly connected north of Ipswich does not offer a sustainable solution and that houses built closer to the centres of jobs growth do.

**Page 66 Para 8.156** Ipswich is not “relatively isolated from competing (shopping) centres” as the Council states Ipswich has excellent transport links. There are a number of shopping destinations generally considered better than Ipswich that are easy to access such as Cambridge and Norwich as well as Westfield (Stratford), Lakeside and of course London. Smaller centres with more upmarket shopping are available at Bury St Edmunds, Woodbridge and Aldeburgh. As stated in Para 8.157 there is no room for complacency.

**Page 66 Para 8.158** We fully support the Council’s commitment to ‘Improving the retail offer in Ipswich’ especially as the retail sector has been identified through the EEFM August 2013 data as the highest jobs growth sector in Ipswich over the period 2011 – 2031, accounting for 30% of the total jobs growth.

**Page 66 Para 8.159** We are concerned that the CS has a position that bucks the national trend regarding Retail especially considering the relative attractiveness of competing shopping centres and the growth of online retailing. IBC appears to be pinning much hope on a major new retail development at Westgate, which seems unlikely given the number of high profile withdrawals from Ipswich high street, the shift to online retailing and the failure over the past 30 years to secure retail redevelopment of Cox Lane/Mint Quarter. We do not believe that a 47% increase in retail jobs in Ipswich Borough is achievable and should be reviewed accordingly.

Ipswich Central (the Business Improvement District Company for Ipswich) produced a report (Focussing Future Investment report, September 2013<sup>7</sup>) noting that "successive property booms have not produced such a project [for Cox Lane/Mint Quarter] and most recent trends in retailing indicate that such covered malls may prove even harder to fund in the future." We also note that Ipswich has seen the loss of several flagship stores in Buttermarket (which is being redeveloped as a cinema complex as it has not been possible to attract new retail tenants), Tower Ramparts and Coop. However we note some welcome news that the new owners of Tower Ramparts are keen to refurbish the site and attract new tenants.

Ipswich Central notes that other than the Waterfront, town centre new development has been far more limited. It states "this has been attributed to the availability of too many rather than too few development opportunities and the pursuit of traditional covered mall shopping centre development which may now be seen to be an outmoded approach." Ipswich Central, Ipswich Borough Council and Suffolk County Council have adopted a Vision for the future direction of the town centre combining the Waterfront and the existing town centre by enhancing the north south linkages between the two zones. We are optimistic that some new retail opportunities can be created by better linking the town centre to the Waterfront.

Ipswich Central has "undertaken a review of development and investment opportunities in the central area and suggested appropriate and alternative uses for each".

- Westgate - "No occupiers have been prepared to commit ahead of construction. Given the ‘off pitch’ retail location, this site may also provide an opportunity for a comprehensive in town residential redevelopment extending Southwards".

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<sup>7</sup> [http://ipswichcentral.com/IPS-CENTRAL-X-FUND-PRESENTATION\\_D3-02\\_012518.pdf](http://ipswichcentral.com/IPS-CENTRAL-X-FUND-PRESENTATION_D3-02_012518.pdf)

- Grafton Way - "Alternative uses should be identified for the site most probably driven by greater emphasis on hotel and/or residential uses."
- Tacket Street and Cox Lane - "These might include a more limited development of a small number of modern retail units fronting a short open mall linking Upper Brook Street and Carr Street combined with a modern multi-storey car park on part and in-town residential development of the remainder."

We feel these views deserve serious consideration especially as Ipswich Central is comprised of people who work in Ipswich retail and presumably have a better understanding of the dynamics of retail in Ipswich than the Council.

**Page 69 Para 8.172** This should also specifically state that 6<sup>th</sup> form provision is required.

**Page 74 CS17** We suggest that under the "Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy" fresh water and sewage infrastructure should be included since both have previously been identified by the Haven Gateway Water Cycle Study as key issues for Ipswich and mentioned in the NALEP 2014 Strategic Economic Plan. With respect to the latter Paragraph 6.92 confirms that the scale and cost of major new connections in relation to water supply and wastewater infrastructure (including treatment plant), is currently inhibiting the progress of some strategic sites in Ipswich. The Plan also identifies rail and road infrastructure improvements it considers key to growth and prosperity. Para 3.25 states "However, our transport network is ageing, and whilst Government investment in dualling the A11 through Suffolk and Norfolk is welcome – further improvements along our major trunk roads - the A11, A12, A14 and A47 are needed to reduce congestion and enable our sectors to compete nationally and internationally." It refers to the A14 as a key link to Europe which is set to grow and lists road infrastructure projects including A14/J57 Nacton £20M, A14/A12 J58 Ipswich Severn Hills Roundabout £10M and A14/A12 J55 Copdock major project £100M. In addition rail infrastructure improvements required refer to the better rolling stock and faster journey times on the Great Eastern Main Line, Felixstowe to Nuneaton electrification, the Felixstowe branch line and the Ipswich Northern Fringe Bridge. We suggest these require a mention under the Key Infrastructure requirement list as well as in CS20.

**Page 82 Para 8.240** We note and support that 'The Council will work with neighbouring authorities and Suffolk County Council to ensure that the merits and delivery options for some form of northern bypass are fully investigated.'

**Page 90 Para 9.24 and 9.25** We feel that where car parking space is provided in the rear garden this space should be in addition to the minimum referred to.

**Page 92 Policy DM4 bullet a.** SUDs may not just affect the immediate area but through draining into watercourses and rivers contribute to the flood risks elsewhere. Although not linked to SUDs we are currently witnessing severe flooding in the Thames Valley and the Somerset Levels due to unusual rainfall falling elsewhere. We suggest a minor amendment to read "it does not increase the overall risk of all forms of flooding in the area or elsewhere".

**Page 108 Para 9.99** This paragraph needs to be clear that air quality is worsening in Ipswich and that further AQMAs are proposed and currently being defined (as indicated in its annual assessments). Pedestrians and cyclists will not want to walk/cycle through AQMAs alongside queuing traffic as this will damage their health therefore undermining sustainable travel options. Unless this fact is recognised the CS will not sufficiently address this major issue.

Ipswich's air quality needs to be assessed in the context of DIRECTIVE 2008/50/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 May 2008 on ambient air quality and cleaner

air for Europe. In relation to NOx the limits are set out in Annex 2.A.2. The Results of Nitrogen Dioxide Diffusion Tubes in 2011 show that the annual mean concentrations already exceed EC limits for many sites. The European Commission has launched legal proceedings against the Great Britain for failing to reduce "excessive" levels of nitrogen dioxide (NO2) air pollution from traffic, despite 15 years of warnings and several extensions and postponements granted to government and is proposing to levy financial penalties accordingly.

We note that the 2013 Progress Report is not yet available but should be ready within the next two months. The boundary review for the new AQMAs should also be available at the same time. It is imperative that the CS and SA take account of these reports in relation to compliance with this Directive.

**Page 127 Para 9.161 fourth bullet** We recommend that the land set aside for SUDs is not included in the calculation of housing density for a development.

**Page 132 Paragraph 10.4** Please refer to our earlier comment in relation to the Ipswich Policy Area board and the need for better working with neighbouring local authorities in relation to the creation of new jobs and the location of new homes near to the sites of those new jobs.

**Pages 134-5** Table 8 does not refer to rail infrastructure enhancements mentioned in the NALEP 2014 Strategic Economic Plan specifically the Great Eastern Main Line, Felixstowe – Nuneaton freight line and Felixstowe to Ipswich Branch Line.

Table 8b) We support the inclusion of this table in the CS but have a number of concerns.

- Provision of the country park and associated facilities e.g. visitor centre/parking must be included in this table. We assume this is an oversight as IBC has stated its commitment to its provision and it is included in the Northern Fringe SPD table. The Appropriate Assessment is also based on the delivery of the country park with parking and a warden-service. If this is not included in the CS document then the Appropriate Assessment will have to be revised.
- Traffic management scheme for Westerfield village, The Crofts and other locations. This needs to specifically reference Whitton and The Dales as well.
- Enhancements to school playing fields and other outdoor recreation facilities for community use. This requirement should include the agreement of an acceptable access plan to enable the community to use facilities during both school and non-school hours. This is especially important given the potential to be free schools/academies.
- Travel Plan development, implementation & monitoring. There should be a requirement for Travel Plans to include the commute from the Northern Fringe development to the sites of new jobs in the Ipswich Policy Area as this will be the major travel pattern of residents at peak times.
- Vehicular rail crossing and Fonnereau Way cycle / pedestrian bridge across rail line. There is a risk that development of Henley Gate reaches 299 homes then stops for several years, whilst other developments continue unabated, resulting in unconnected developments. This needs to be guarded against especially in relation to access to the high school and district centre from Henley Gate.
- 2FE (form of entry) primary school & nursery. There is a risk that development stops at 399 homes on the Southern development or 199 homes on either of the Northern or Eastern developments for several years without the provision of a primary school. How would this be addressed, as existing primary schools would not be able to accommodate the increase in schoolchildren? In order to manage this risk, we believe that there should also be a fallback requirement for a primary school on the Northern Fringe, once a minimum number of houses across all three neighbourhoods has been reached.

- Likewise there is a similar risk for the 1,200 space secondary school (including sixth form facility) with development stopping at 499 homes for several years. How would this be addressed as school places are required for the Northern Fringe development and as a result of the additional two form entries at St Margarets and Rushmere primary schools?
- There is a similar but even larger risk in relation to any required strategic improvements to the sewerage system. We are concerned that major infrastructure works will be required to allow sewage treatment from the Northern Fringe development at Cliff Quay STW and the worrying lack of information from Anglian Water on this issue. We note that there are existing odour issues at Cliff Quay STW, which are detrimentally impacting on local residents and the ability to develop adjacent sites. Anglian Water stated at the Community Steering Panel meeting of 12<sup>th</sup> February 2013 (see minutes) “it was currently liaising with developers to reach solutions for water and drainage supply. Notably, dealing with foul drainage might either involve the construction of a new sewer from the site to Cliff Quay or alternatively to pipe sewage to an upgraded treatment works at Donkey Lane, Tuddenham. End of March [2013] was anticipated for the deadline for the current work-stream.” At the time of writing whilst we understand that proposals have been made for fresh water supply, Anglian Water has still not produced a foul water plan for the Northern Fringe, which is extremely worrying. The Council needs to obtain assurances and greater detail from Anglian Water that the delivery of sewage infrastructure will be timely and affordable. Details of Anglian Water’s preferred solution should be included here as this could create major disruption across Ipswich and jeopardise the timing, size and cost-effectiveness of the development. For instance, if say 499 homes could be readily connected to the existing sewage system without major investment and that any more would require major investment, what might this mean for the timing and delivery of the Northern Fringe development?
- By risking uncontrolled multiple starts across the Northern Fringe, theoretically 499 homes could be built without any new schools, local centre infrastructure framework, vehicular and Fonnereau Way pedestrian rail crossings or a country park. Whilst we know that this is not IBC’s intention, this major loophole needs to be guarded against and closed through amendments to the CS. If major sewage infrastructure works is required after say 499 homes this is a very real risk that has been overlooked.

**Page 143 Objective 3** Please see earlier comments regarding both the homes target and jobs targets. As we have previously stated “up to 12,500 additional jobs shall be provided” could mean anything between 1 and 12,499 and needs to be revised to a specific target if it is to drive forward job creation. It should clearly specify that this relates to Ipswich Borough. Just providing new homes will not result in providing “a decent home for everyone”. Part of the solution can only be achieved through upgrading the existing housing stock yet the Core Strategy completely fails to address this fundamental issue and needs to do so. We also disagree with the removal of the target for the use of Previously Developed Land and suggest one or a number of time related targets are reinserted so that this drives the regeneration of brownfield sites particularly in deprived areas.

**Page 143 Objective 4** We agree that “The development of the Borough should be focused primarily within the central Ipswich “IPOne” area and within and adjacent to identified district centres”. However, this will not be the case for the creation of new jobs with principle growth areas being identified outside the town centre nor for housing development since the Northern Fringe development will inhibit this.

The Target needs to relate to the land area of the development in order to deliver the objective rather than relating to the number of developments. If the largest developments are outside Central Ipswich then the Target could be met without delivering the Objective, which is unsound.

**Page 144 Objective 6** This is out of date regarding the Major Scheme references – does IBC still report on these national indicators? The objective needs to improve sustainable transport from homes to new centres of major employment with an appropriate target.

**Page 146 Objective 10** This should include a target to improve educational attainment levels in order to help increase the skills base of future employees.

**Page 146 Objective 11** The indicator does not relate to the Objective. Better indicators are required e.g. number of physical crimes reported.

**Page 146 Objective 12** We would advocate that the IPA make visible to the general public through Council websites details of meetings, minutes and working documents subject to commercially sensitive information being excluded. One indicator could be the frequency of IPA Board meetings held per year. The target needs to relate to homes as well i.e. the Ipswich Housing Market Area and its constituent parts. IBC has repeatedly refused to release the reports and papers arising through the Ipswich Policy Area Board to the general public and the Board failed to meet between November 2012 and 2013. This is unacceptable as does not allow the general public to monitor the delivery of the CS or whether the local authorities are fulfilling their duty to cooperate. Greater transparency of the work of the Ipswich Policy Area Board is required and as such the Core Strategy must commit the Board to making all its work and papers etc available to the general public in a timely manner.

**Page 147 Para 12.1** We would like it to be clarified that the monitoring of jobs delivery within Ipswich Borough, not just the Ipswich Policy Area, will be undertaken. We have seen no evidence of monitoring of the “Delivery of jobs within the Ipswich Policy Area” despite several requests for data. The monitoring of jobs data should specifically identify the net new jobs created in Ipswich Borough and in the central Ipswich “IP-One” area.

**Page 167 Appendix 7** It would be helpful if the definition of the Ipswich Northern Fringe along with the three areas referenced in Table 8B be added to the Glossary.

**Page 172 Appendix 7** It would be useful to add New Anglia Local Enterprise Partnership (NALEP) to the list and the Glossary.

Rod Brooks & Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group<sup>8</sup>

7<sup>th</sup> March 2014

Issue 1

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<sup>8</sup> The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its 183 members and 140 other residents who have authorised the NFPG to represent them totalling 323 people. A list can be supplied on request.