



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Comments on the Ipswich Borough Council Proposed Core Strategy and Policies Development Plan Document Review

Pre-Submission Main Modifications

– Consultation Ending 23rd November 2015

We note that the ‘Pre-Submission Main Modifications’ are mainly editorial in nature, update plans to reflect planning permissions granted and lapsed, address the Government withdrawal of the Code for Sustainable Homes and accommodate other legal changes.

They fail to address the substantial number of key issues raised during the consultation that ended on 5th March 2015 and are summarised in the IBC Local Plan Statement of Consultation. Furthermore, despite requests, there has been no explanation of why such key issues have not been taken into account.

Paragraph 3.4 of the Statement of Consultation states that it summarises the main issues arising from the consultation. This is incorrect since several main issues have been either omitted or not adequately captured. Examples of this are contained within the attached appendix but in summary:

- The lack of any effective policies and outcomes from the duty to co-operate calls into question compliance with the Localism Bill and, if not compliant then the examination of the CS by an independent inspector would be premature.
- The assessment of housing need has not been updated to reflect the most recent information available including the DCLG Household Projections 27th February 2015 and ONS Migration data.
- The allocation of the entire Ipswich Northern Fringe (known as the Ipswich Garden Suburb) is a high-risk strategy since the delivery may not be viable due to severe traffic congestion, negative impact on air quality and lack of sewage infrastructure.
- There has been a failure to address the cumulative needs for key strategic infrastructure within the Borough including new roads and sewage, which are already at full capacity.
- There has been a failure to address the severe obstacles to jobs growth identified by the viability testing report produced by Peter Brett Associates in December 2014 and the employment space requirements identified by the East of England Forecasting (EEFM) 2015 Model.
- There has been a failure to include the major financial investment by IBC in the acquisition of the Sugar Beet site located in a neighbouring Local Authority and how this will impact on the jobs and homes growth strategies within Ipswich Borough.

We would suggest that by disregarding the genuine concerns and issues raised by members of the public and other interested parties, IBC risks undermining confidence in local democracy. We note that a total of 1090 individuals and organisations submitted a total of 9325 representations. Of the 45 recommendations for improvement we submitted, only parts of two recommendations have been included in the 'Main Modifications'. We therefore see little point in making further detailed representations on the 'Main Modifications' at this stage.

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Submitted on behalf of the Northern Fringe Protection Group¹

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Appendix Comments on Statement of Consultation September 2015

Paragraph 3.4 of the Statement of Consultation states that it summarises the main issues arising from the consultation. This is incorrect since several main issues have been either omitted or not adequately captured. For example:

- Policy 4.4 777 representations are recorded against the following summary 'IBC has not demonstrated that it has effectively worked with neighbouring 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. IBC needs to demonstrate that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council. IBC needs to explain in the CS how this strategic purchase aligns with employment and housing growth strategies and targets (to focus new employment within the town centre)'.

Clearly whether or not the CS complies with the Localism Bill is a main issue. The first bullet point in Paragraph 3.4 does not adequately capture this issue by merely stating that 'concern was raised in respect of ...and the effectiveness of the duty to co-operate.'

As the largest financial investment by far that the Council has made in Ipswich, clearly the Council will need to give the sugar beet factory site major attention and resource in achieving a return on its investment. The impact of this needs to be assessed on the CS in relation to IBC stating that it will focus development on the town centre and in creating jobs within the Borough (as opposed to in Babergh DC where the Sugar Beet site is located).

- The first bullet point of paragraph 3.4 also states that 'The need for 13,550 dwellings was also questioned'. The key issue omitted from the representations was 'The assessment of housing need had not been updated to reflect the most recent information available including the DCLG Household Projections 27th February 2015 and ONS Migration data.' The DCLG data projects a need for 10434 homes compared with the CS target of 13550 homes. According to Government Guidance plans 'should be updated to reflect the most recent information available' yet this has not happened.

¹ The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its members and other residents who have authorised the NFPG to represent them. A list can be supplied on request

- The first bullet point of Paragraph 3.4 also states that ‘...although the jobs forecast was questioned with a concern it is too high’. This completely fails to capture the approximate 1000 representations against CS13 identifying the severe obstacles to jobs growth identified by the viability testing report produced by Peter Brett Associates in December 2014 for IBC, namely it is not commercially viable to develop new offices, industrial units, warehousing and large retail offerings in Ipswich. The CS jobs growth targets are based on the East of England Forecasting Model (EEFM) 2015 run, which also identifies the employment space requirements needed to support the jobs growth. By way of example, we note that EEFM identifies a requirement of 94165 sq m (>1,000,000 sq ft) of new office space and 17103 sq m of new warehouse space by 2031. The key issue is, if it is not viable to build the new employment space then the employment growth is completely unrealistic. This has not been captured from our representations. We also note that the forecast jobs growth rate is 11 times that achieved over the past 20 years.
- Paragraph 3.4 bullet point 5 fails to accurately reflect the main points raised in the representations particularly questioning the soundness of ‘allocating the entire Northern fringe when its delivery may not be viable over the timescales’; this coupled with ‘multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre’; and referring to concerns over ‘water infrastructure capacity’ does not adequately capture the representations which point out that wastewater infrastructure is at full capacity and the CS fails to identify and plan for new wastewater infrastructure. This could be a showstopper for growth, prevent the delivery of the Ipswich Garden Suburb and calls into question the effectiveness of the CS to be delivered.