



NORTHERN FRINGE PROTECTION GROUP Safeguarding the Character of Ipswich

Comments on the Ipswich Borough Council Core Strategy and Policies Review – Consultation Ending 5th March 2015

Please find our representation on the above, which should be considered in conjunction with our representations on the associated revised Site Allocations & Policies Document and the Sustainability Appraisals (SA). We want to see a sound evidence-based Core Strategy (CS) in place and believe our proposals will improve the CS and help make Ipswich a more attractive place to live and work.

We will endeavour to raise the key concerns of the Ipswich residents we represent, highlight areas of non-compliance and lack of soundness and where possible suggest improvements.

Our representation in this document falls into 2 sections:

- i. Key issues to be brought to the attention of the Government appointed Inspector.
- ii. Issues raised in sequential order with respect to the CS to make it easier for Ipswich Borough Council (IBC) to gather together and summarise issues from the various representations. Issues may be repeated in line with the points raised within the CS but, in view of the size and complexity of the CS, we feel it would not be reasonable to expect members of the public to cross-reference comments against all occurrences within the documents. We look to the Ipswich Borough Council (IBC) to ensure continuity for any changes made to the formal documents.

i. Key Issues

Duty to Co-operate – We submit is currently non-compliant

The duty to co-operate legislation was enacted on 15th November 2011 in the Localism Bill. Guidance produced by the Government¹ states “Local planning authorities will need to satisfy themselves about whether they have complied with the duty. As part of their consideration, local planning authorities will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters.” We submit that until recently (i.e. 2012/2013) little effort has been made by IBC to constructively engage with neighbouring Local Authorities (LAs) and there is **no recent evidence (e.g. since the Act was passed) of effective and deliverable policies on strategic cross boundary matters**. So, at present IBC are non-compliant with the Act. However, since 2012/13 proactive engagement has begun to happen **but effective policies and outcomes have yet to emerge**. Some progress is being made but in our opinion it is premature to submit the revised Core Strategy (CS) for Independent examination by a Government appointed Inspector until such work is released and can be examined and incorporated in the CS, particularly as we consider it unsound in its current form. The effectiveness of the CS would be greatly improved through cross-boundary joint initiatives and it could be made sound. The public needs to have the opportunity to comment on these in the spirit of the Statement of Community Involvement.

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/duty-to-cooperate/what-is-the-duty-to-cooperate-and-what-does-it-require/>

Recommendation We submit that there is insufficient recent evidence (e.g. since the Act was passed) of effective and deliverable policies on strategic cross boundary matters and as such IBC is non-compliant in its Duty to Co-operate. The Inspector needs to thoroughly assess the evidence on the 'Duty-to-Co-operate' to assess whether this is the case and if so, to recommend non- adoption of the plan.

Para 4.2 Until relatively recently there has been little public evidence of efforts being made by IBC to engage and reach agreement with neighbouring LAs on key topics such as housing, local economy matters and strategic infrastructure, despite the long establishment of the Ipswich Policy Area Board. As evidence of lack of engagement we note that IBC did not join with the other IPA Local Authorities in commissioning the 2012 Ipswich Strategic Housing Market Assessment, the previous version being in 2008 and well out of date. Since the publication of the IPA Board's Revised terms of reference in September 2012 meetings have become more frequent and a work programme established, which we very much welcome. We also welcome a recent improvement in public transparency by a web page showing minutes and topic papers being established on the Council's website in Q4 2014 www.ipswich.gov.uk/content/ipswich-policy-area.

We find no recent public evidence of any strategic policy outcomes from the IPA other than possibly the proposed alignment of the jobs growth sectors within the Ipswich Core Strategy to the Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership Strategic Economic Plan, although this could have been achieved without any IPA influence simply by aligning the CS to the relevant publications.

There are no published joint topic papers on housing growth, jobs growth and strategic infrastructure including addressing well know issues such as roads, fresh water and foul water. We note that the forecast jobs growth combined from the Core Strategies of the IPA Local Authorities is 26% higher than the total forecast by the latest published EEFM data (January 2015) across these authorities. There is a risk that the individual jobs targets of each local authority are unrealistic when compared to the total potential across the four authorities and this has not been rectified.

IBC 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 so that housing growth occurs closer to sites of expected jobs growth. We would like to see this happen since it would help make the CS sound but to date there is no published strategic outcome.

Para 4.4 We have found no published evidence of outcomes on 'strategic growth matters' through the IPA Board.

IBC has recently purchased the old Ipswich Sugar Beet site for £10M, which is outside the Borough and lays within Babergh, an IPA partner. This acquisition does not align with the adopted Core Strategy and it is unclear how it could relate to the revised Core Strategy. We also note that IBC may have intentions for the land that may not accord with the employment land designation assigned by Babergh.² In particular it raises the issue of whether IBC intends to build houses on part or all of the site, which needs to be examined as part of this CS review.

Recommendation IBC needs to provide evidence to the Inspector that this strategic acquisition was with the prior agreement of Babergh Council, publish it's intentions for the site

² Ipswich Angle (February 2015) the leader of Ipswich Council, Councillor Ellesmere, states in relation to the Sugar Beet factory that "We know what Babergh's current planning policy is but this does not rule out opportunities for other uses on the site in the future".

and confirm that these have been agreed with Babergh. IBC must provide evidence that these intentions are compliant with the Core Strategies of both authorities, otherwise it will have failed in its duty to co-operate and the plan should not be adopted.

Ipswich has a constrained boundary and there are key cross-boundary strategic matters that would substantially benefit from co-operation and improve the effectiveness and soundness of the CS. We want the CS to ensure that this will happen. Although recent evidence might suggest things are moving in the right direction it is far too early to say that the IPA is an effective framework for strengthening Local Plans.

Recommendation In our opinion, the lack of published evidence of any effective outcomes from the duty to co-operate suggest the revised IBC CS is premature and more time should be allowed for Ipswich Policy Area (IPA) Board strategic outcomes to be incorporated into the CS. We recommend non-adoption of the CS until this happens.

Core Strategy Soundness

1. **Summary** In our opinion the revised CS is unsound and fails on the grounds of not being positively prepared, justified and effective and should be rejected.

We examine the CS in detail and produce recommendations for improvement detailed below.

2. **Not Positively Prepared** The plan fails to properly assess development and infrastructure requirements, including the indication of cumulative and synergistic effects produced by neighbouring local authorities. Key areas include road traffic and the severe traffic congestion forecast through housing growth, air quality, fresh water and foul water infrastructure. Although the CS acknowledges traffic congestion and air quality within the town as issues linked to the wider transport network, we are not aware of any Transport Assessment having been undertaken by Suffolk County Council since 2008 or indeed by IBC or IPA on the cumulative effects of growth. We strongly agree with Section 4.3.1 of the Sustainability Appraisal, which recommends that updated traffic modelling and associated air quality modelling is undertaken. Without such data the plan cannot be described as positively prepared and is unsound. Whilst CS20 supports feasibility studies into a wet dock crossing and a 'northern bypass or a link road to the north of the town' at this stage such proposals can only be viewed as aspirational. In our opinion without the latter the development of the Ipswich Garden Suburb is unsustainable, the CS unsound and should be rejected.

Although the CS mentions issues on freshwater and foul water infrastructure, we find no evidence of objectively assessed needs within Ipswich Borough or the IPA, no reference to strategic solutions, no key listing in the infrastructure tables and so the plan is unsound and should be rejected.

Recommendation Although the CS mentions issues on freshwater and foul water infrastructure, we find no evidence of objectively assessed needs within Ipswich Borough or the IPA, no reference to strategic solutions, no key listing in the infrastructure tables and so the plan is unsound and should be rejected. To improve soundness the latest forecast data should be used and compared with the latest baseline data. Updated traffic and associated air quality modelling should be undertaken to assess the cumulative effects of proposed developments within Ipswich and neighbouring LAs so as to propose effective mitigation measures where possible, or to prevent development proceeding without appropriate infrastructure. Similarly fresh water and foul water infrastructure need to be objectively assessed and feasibility studies undertaken into possible solutions and key infrastructure listed in the CS.

Not Justified In our view, the CS is flawed because it does not look at alternatives to the Policies other than “do nothing”. For example, through co-operating more closely with other LAs and locating new homes nearer to identified employment growth sites, a more sustainable solution could have been found to building on the Ipswich Northern Fringe which is remote from major sites of new employment and not connected by sustainable transport. Despite being raised by us many times over a long period, this option has not been investigated, possibly because IBC considers that the NPPF³ requires housing needs to be met within the Borough boundary unless they are unable to do so. The NPPF gives 2 examples where the requirement can be set aside one being ‘*because to do so would cause significant harm to the principles and policies of this Framework.*’ We would argue that lack of sustainability would be a key reason and also the significant harm inflicted upon the town through severe traffic congestion. It could have been an exemplar of effective joint working on cross-boundary strategic issues but is instead a wasted opportunity.

Recommendation In our view, the CS is flawed because it does not look at alternatives to the Policies other than “do nothing”. To become sound, IBC needs to co-operate more closely with other LAs to jointly plan for locating new homes nearer to identified employment growth sites and produce sustainable solutions in accordance with the National Planning Policy Framework.

3. Not Effective In our opinion key aspects of the plans have little chance of being realised and are unsound.

Policy CS10: Ipswich Garden Suburb IBC pins much hope on the Ipswich Northern Fringe being developed as an urban garden extension (referred to as Ipswich Garden Suburb (IGS)) providing approximately 3500 new homes. However there are two major issues that could scupper this plan or severely constrain the development and these need to be fully recognised in the CS:

- The Traffic Assessment submitted by CBRE/Mersea Homes⁴ as part of its planning application (14/00638/OUTFL) shows that traffic from the IGS will have a severe adverse impact across the whole of the north of Ipswich and the town centre. In their response to the CBRE/Mersea Homes Hybrid Planning application⁵ Suffolk County Council (SCC) stated “*Even with the lack of information and methodological flaws, the results indicate that the development has a severe impact on network performance and travel times.*” Please see the Appendix to this document. Unfortunately, mitigating proposals from IBC assume a modal shift onto public transport to the town centre, cycling and walking but this appears unrealistic as the key identified employment growth sites are not in the town centre and not easily reached by sustainable transport (CS5 refers). We welcome the recent appointment of WSP by Suffolk County Council (SCC) to undertake a study into possible solutions for the road network around the Northern Fringe, including the feasibility of some form of northern relief road, since the lack of new road capacity on already heavily congested roads does not appear to us a viable solution. This is long overdue and the outputs of this must be taken into account in the CS in order for it to be sound. We also note the concerns of SCC in the Cabinet’s paper⁶ on its response to IBC’s Local Plan which states “More recent assessments of the planning application for proposed development in the Northern Fringe have, however, suggested that there are not, currently, identified sustainable transport measures to ensure that the development impacts are adequately mitigated. Given the key role of the

³ Paragraph 179, National Planning Policy Framework 27th March 2012

⁴ Table 11.2 page 92 CBRE Mersea Homes Transport Assessment Hybrid Planning Application Prepared by Croft Transport Solutions July 2014

⁵ Para 46 page 8 Suffolk County Council (Consultee Code ETPR01) submission to Planning Application 14/00638/OUTFL

<https://ppc.ipswich.gov.uk/xappncons.asp?pageNumber=5&iappId=14%2F00638%2FOUTFL&>

⁶ Agenda Item 6, SCC Cabinet 24/02/15.

northern fringe, this makes it more likely that the planned development could give rise to severe traffic congestion across the town's road network." These views need to be taken into account. We also note that there has not been any traffic assessment of the effect of multiple starts across the Northern Fringe as proposed in the CS. This is unsound and needs to be undertaken before multiple starts can be contemplated.

- The foul water pipeline from the north of Ipswich to the main treatment works is at capacity and despite this problem being known about for some considerable time, no viable solution has emerged. This could be a 'show stopper' in terms of both the timescales for a technical solution and the financial viability of the project but it is not acknowledged in the CS. There is no specific reference to sewage requirements in the infrastructure table, which needs to be rectified.

Recommendation It is unsound to allocate the entire Ipswich Northern Fringe when its delivery may not be viable over the timescales of the plan. A 'Plan B' is recommended based on the alternative option highlighted above, which should be explored and included in the plan.

We also note that there is currently no delivery mechanism to ensure the timely delivery of the Country Park as an effective mitigation strategy to safeguard the Stour and Orwell Estuary Special Protection Area protected under the Habitats Directive and as such the CS is unsound.

Recommendation To safeguard the Stour and Orwell Estuary Special Protection Area an effective delivery mechanism needs to be determined and an alternative investigated should the IGS Country Park not be deliverable by the required timescales else the CS is unsound.

Para 8.205 Air Quality issues, which are likely to be made worse by increasing traffic congestion, may also impact on the effectiveness of the CS. The Executive Summary of the 2014 Air Quality Annual Report (July 2014) states "Monitoring results from diffusion tubes and continuous monitors located within existing Air Quality Management Areas have shown exceedances of the nitrogen dioxide annual average objective level. Exceedances were also obtained at locations outside of the existing Air Quality Management Areas."

Recommendation IBC needs to provide evidence that air quality pollution levels will not breach legal limits and jeopardise delivery of its CS else the CS is unsound.

Para 6.8 Objective 3(a) & Policy CS7 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. As an example the ONS migration data for Ipswich used in the Council's study only went up to 2010/11 and an average of the previous 5 years was used at 404/year over a 20-year period. Contrast this with the latest ONS forecast⁷ that forecasts no net migration from 2012 to 2031 for Ipswich. The targeted reduction in "benefits migration" endorsed by all political parties means that immigration will be driven by economic migrants moving to those places with the best jobs and highest wages. Unfortunately this is not Ipswich and hence shows that the Trend Migration scenario is flawed and should be rejected. The latest ONS population forecasts need to be used in the calculation of housing demand in order for the CS to be sound. If this is not the case, then IBC must identify what

⁷ <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/rft-projected-coc.xls>

measures it intends to take to attract more immigrants to Ipswich than the ONS forecasts in line with its Trend Migration scenario.

- The Department of Communities and Local Government's (DCLG) produced household projections in February 2015 based on the latest ONS forecasts referred to above suggesting a need for 10,434 new homes. These should be used to revise the IBC CS housing targets.
- IBC has used a baseline household data figure of 58,700 that 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, nor the most recent DCLG 2012 figure of 57,440 (released in March 2015) nor the figure of 57,200 contained in EEFM 2015. It needs to be lowered accordingly and the analysis revisited. The DCLG 2012 outputs forecast a demand for new homes of 10,434 in 2031, which is far below the IBC target of 13,550.

Recommendation **The CS is currently unsound since it does not use the latest forecast population and household data. IBC should revisit the Ipswich Population and Household projections and revise the household target giving proper consideration to the latest data from the ONS and the DCLG 2012 figures (released in March 2015) which should be used to assess housing demand.**

Para 6.8 Objective 3(a) & CS12 Viability underpins the National Planning Policy framework. We note that CS 12 states *'This will be achieved by requiring new development at the Ipswich Garden Suburb to provide for at least 35% on-site affordable housing by total floor space.* However, Para 4.2 of the IBC response to the Ipswich Viability Report produced by Peter Brett & Associates in December 2014 states *'The indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure'*. Clearly it is unsound to set a target of 35% when the viability report indicates 28%. We understand that the IGS infrastructure costs were developed mainly in the summer of 2013. Since then additional costs appear to have emerged due to wastewater infrastructure⁸ and we would expect similarly for highway changes. A realistic and achievable target needs to be set for affordable homes that will not compromise the identified infrastructure requirements for the IGS. To avoid ambiguity and to lower the risk of key infrastructure not being delivered, a detailed IGS Infrastructure Delivery Plan should be agreed with developers and in place prior to any site development commencing.

Recommendation **The target for affordable homes on the IGS should be set at a realistic level that will not compromise the identified infrastructure requirements. For soundness, it should initially be set at an indicative level proposed by the viability report subject to revision as the IGS infrastructure costs become clearer. The quality of the development and infrastructure requirements should not be sacrificed in order to deliver the affordable homes target. To avoid ambiguity and to lower the risk of key infrastructure not being delivered, a detailed IGS Infrastructure Delivery Plan should be agreed with developers and in place prior to any site development commencing.**

Para 6.8 Objective 3(b) & Policy CS13 Growing the economy is one of the biggest challenges IBC faces. In a recent Cities Outlook 2015 report⁹, which analysed the economy of 64 UK Cities that included Ipswich, it noted that over the 10-year period 2004 to 2013 in percentage terms Ipswich experienced the 8th highest population growth, the 3rd highest housing growth but lost 1,095 jobs. Clearly it is unsustainable to continue this trend, unless Ipswich becomes more of a commuter town with enhanced sustainable transport links but this forms no part of the CS Vision. The proposed CS remains unclear on whether the jobs target of "in the region of 12,500 jobs" applies to Ipswich

⁸ For example the proposed large storage tanks under Henley Rd and additional pumping stations contained in the CBRE outline planning application for its IGS site.

⁹ Centreforcities Cities Outlook 2015 report published 19th January 2015.

Borough or Ipswich Policy Area and what it actually means? How will we know if the jobs target has been met if it is not clear what it actually relates to and how it is measured? We note that there are no indicators within the CS that refer to jobs measurement and so the CS is ineffective and unsound. This is surprising since the Government National Office of Statistics produces an annual report on jobs via the Annual Business Survey and employee data via the Business Register and Employment Survey, decomposed down to Local Authority level. No Government employment data is produced for the IPA. If IBC intends to help grow jobs outside the Borough in association with the IPA, a commendable intention, then a separate jobs target and measurement process must be established for effectiveness. Since no indicators are proposed in the CS for how jobs created by IBC outside the borough are to be measured, such an objective is currently unsound.

Recommendation Without properly defined specific and measurable jobs growth objectives the CS is unsound and should be rejected. Assuming IBC intends to help grow jobs outside the Borough in association with the IPA then to improve effectiveness and clarity two jobs targets are required in the CS:

- The first for the Borough of Ipswich, in a similar manner to and linked to the homes target to achieve sustainability. A measurement indicator should be specified such as the ONS Annual Business Survey and/or Business Register and Employment Survey. If the current form of wording is used then ‘in the region of’ needs to be defined.
- The second for how IBC will help to create jobs in neighbouring LAs within the IPA. Consideration will need to be given to how success can be measured locally since government data will not be available and the IPA Board does not appear to be currently monitoring this.

We are pleased that IBC has taken our advice and better aligned its target employment sectors with NALEP and the Suffolk Growth Strategy. However a recent study¹⁰ into the viability of the Ipswich Development Plan calls into question the viability of developing new offices, industrial units and warehousing in Ipswich. Para 8.3.2 states “none of the office development scenarios are viable” and Para 8.5.1 “industrial and warehouse development in Ipswich is not viable”. We note that the EEFM 2015 data¹¹ shows to meet the forecast employment growth office floor space will need to increase by 36% to 94,165 sq m (equates to accommodation for approximately 7,850 people at 12 sq m per person). It also shows warehouse floor space will need to grow by 17,103 sq m but industrial floor area contract by 18,560 sq m.

The key driver for jobs growth in Ipswich is linked to local population growth, rather than national or international products & services (see the analysis later in this document). IBC bases its jobs forecasts on the EEFM, the latest forecast being 8th January 2015. Worryingly, the EEFM 2015 forecasts a significantly larger population in 2031 of 162.8k compared to the latest ONS projection of 152k and the Trend Migration Scenario of 154.7k adopted by IBC in the CS. This difference of 8.8k–11.5k is substantial. Using a much higher population forecast to estimate the number of jobs than that used to estimate new homes growth is fundamentally flawed and hence the CS is unsound.

Policy CS 14 Retail Development Regarding retail development in Ipswich, the Viability study found (Para 8.7.5) “It shows that both small comparison retail scenarios and small format convenience retail are marginally viable. However, large format convenience retail is not viable.” The latter challenges the deliverability of a large retail offering on the former Westgate site. The above study calls into question the effectiveness of the CS to deliver the jobs target for Ipswich especially new jobs in the town centre. The CS has failed to acknowledge these severe obstacles to jobs growth and to put forward proposals on how they may be overcome. As such the CS is unsound. We want to see

¹⁰ Viability Testing for the Ipswich Development Plan, Peter Brett Associates December 2014

¹¹ Latest forecasts 8th January 2015 <http://www.cambridgeshireinsight.org.uk/EEFM>

the inclusion of further measures in the CS that will help improve the Retail offering in Ipswich and deliver new jobs.

Policy CS13 states that IBC will “focus on the delivery of jobs within the Borough” but fails to mention the acquisition of the disused sugar beet factory, which is designated employment land, and how this will fit into the employment strategy. We note that this acquisition does not feature within the currently adopted CS, does not feature in the revised CS, is outside the Borough and is likely to deflect management attention away from growing jobs in the Borough in breach of Policy CS13. This needs to be explained. The cost of this acquisition, debt servicing and the cost of developing infrastructure on this site is material and in our view is non-compliant with Policy CS13.

Recommendations **The CS is unsound and should be rejected. To improve the soundness of the CS IBC needs to:**

- **Address the severe obstacles to jobs growth identified by the Peter Brett & Associates report and how they might be overcome.**
- **Produce a specific, measurable, achievable and realistic jobs target for the Borough of Ipswich that is in balance with the housing growth target. A lower target and a stretch target might be one consideration else ‘in the region of’ needs to be defined.**
- **Explain how the recent strategic acquisition of the sugar beet site fits into the CS and revise the CS accordingly.**
- **Take account of the large difference in population forecasts in the EEFM model from the ONS and Trend Migration forecasts and how this will impacts on the jobs forecasts.**
- **Review the forecast growth of the business services, professional services and retail sectors which seem particularly high.**

ii. Issues raised in sequential order with respect to the Core Strategy

(Note: not all sections are commented on, only those we think unsound and need to be addressed)

CS6 Vision We support the vision but in our opinion the strategy will not deliver it, is ineffective and unsound. The Traffic Assessment by CBRE/Mersea Homes shows that by developing the Ipswich Northern Fringe (CS10 Ipswich Garden Suburb) without improving existing roads or providing new roads external to the site will result in severe congestion and gridlock on an almost daily basis, not just in the north of Ipswich but also in the town centre. This could also worsen air quality, which already exceeds legal limits in parts of the town centre. Traffic congestion has always been a major concern voiced by local residents, which has until recently fallen on deaf ears. The proposals to mitigate traffic congestion through improved sustainable transport (buses, walking and cycling) to the town centre are flawed since the evidence challenges the viability of significant job creation in the town centre. The reality of homes growth without local jobs growth and lack of sustainable transport options to sites of employment growth will inevitably result in more commuting by car. This will harm the town and make it less attractive for attracting new business investment and improving the prosperity of the town and its residents. Whilst appreciating the pressures upon IBC to enable significant homes growth, such growth must be sustainable and IBC must face up to the traffic issue and that the proposed solutions are a high risk strategy that have little chance of success. We strongly agree with Section 4.3.1 of the Sustainability Appraisal, which recommends that updated traffic modelling and associated air quality modelling is undertaken.

Recommendation **Without a realistic and effective strategy for delivering the vision, the CS is unsound and should be rejected. The vision should be kept but IBC must develop a realistic strategy with neighbouring Local Authorities via the IPA Board to encourage homes growth nearer to sites of employment growth as suggested above. Updated traffic modelling and associated air quality modelling must be undertaken before the CS can be adopted (see our comments under**

CS10). The CS also need to be revised to include all new transport infrastructure that is identified as being required to deliver its targets (see our comments on Para 6.17) or those targets adjusted to reflect what is realistically achievable given the traffic constraints.

Para 6.8 Objective 3(a) We note “13,550 new dwellings shall be provided to meet the needs of Ipswich within the Ipswich Housing Market Area”(IHMA). The ‘Ipswich Housing Market Area’ needs to be defined in the CS Glossary but it is normally taken to mean the entire housing area covered by Ipswich, Babergh, Mid Suffolk and Suffolk Coastal that amount to approximately 198k dwellings in the 2011 Census. It remains unclear what ‘the needs of Ipswich’ are in the context of the IHMA for areas outside the Borough of Ipswich that IBC will seek to provide housing. Evidence will need to be shown to the Inspector that this has the agreement of the neighbouring LAs. It is not clear what is meant by ‘provide’? e.g. does it mean active intervention through the purchase of land in neighbouring LAs such as the recent purchase of the disused sugar beet factory or influence and co-operation with LAs? A recent quote from the leader of the Council (see footnote 2) might indicate that this is the case. This needs clarification in the CS else it is unsound.

Recommendation **Objective 3(a) is so poorly defined as to be ineffective and as such the CS is unsound and should be rejected. To make it sound**

- **A specific, realistic and measurable housing growth target is required for the Borough of Ipswich based on the best available data and forecasts.**
- **Assuming IBC plans to help to grow housing in neighbouring LAs within the IPA, to be effective and for soundness this needs to be explained and agreed with neighbouring LAs possibly through the IPA Board, together with an outline plan of how it will be achieved and how success will be measured.**
- **IBC needs to clarify its intentions for the disused Sugar Beet factory site that it has recently purchased in the Babergh Local Authority Area, in particular whether it intends to build homes on part or all of the site.**
- **Housing need should be calculated on the best available data i.e. the latest ONS forecasts and DCLG March 2015 release which projects a need for 10,434 homes.**

Para 6.8 Objective 3(a) & Policy CS7 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. As an example the ONS migration data for Ipswich used in the study only went up to 2010/11 and an average of the previous 5 years was used at 404/year over a 20-year period. Contrast this with the latest ONS forecast¹² that forecasts no net migration from 2012 to 2031. This shows that the Trend Migration scenario is flawed and should be rejected.
- The Department of Communities and Local Government’s (DCLG) produced household projections in February 2015 based on the latest ONS forecasts referred to above suggesting a need for 10,434 new homes. These should be used to revise the IBC CS housing targets.
- IBC has used a baseline household data figure of 58,700 that 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, nor the 2012 DCLG figure of 57,440 (released in March 2015) nor the figure of 57,200 contained in EEFM 2015. It needs to be lowered accordingly and the analysis revisited.

¹² <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/rft-projected-coc.xls>

Recommendation **The CS is currently unsound since it does not use the latest forecast population and household data. IBC should revisit the Ipswich Population and Household projections and revise the household target giving proper consideration to the latest data from the ONS and the DCLG, the latter being expected in February 2015.**

Para 6.8 Objective 3(a) & CS12 Viability underpins the National Planning Policy framework. We note that CS 12 states *'This will be achieved by requiring new development at the Ipswich Garden Suburb to provide for at least 35% on-site affordable housing by total floor space.* However, Para 4.2 of the IBC response to the Ipswich Viability Report produced by Peter Brett & Associates in December 2014 states *'The indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure'*. Clearly it is unsound to set a target of 35% when the viability report indicates 28%. We understand that the IGS infrastructure costs were developed mainly in the summer of 2013. Since then additional costs appear to have emerged due to wastewater infrastructure¹³ and we would expect similarly for highway changes. A realistic and achievable target needs to be set for affordable homes that will not compromise the identified infrastructure requirements for the IGS. To avoid ambiguity and to lower the risk of key infrastructure not being delivered, a detailed IGS Infrastructure Delivery Plan should be agreed with developers and in place prior to any site development commencing.

Recommendation **The target for affordable homes on the IGS should be set at a realistic level that will not compromise the identified infrastructure requirements. For soundness, it should initially be set at an indicative level proposed by the viability report subject to revision as the IGS infrastructure costs become clearer. The quality of the development and infrastructure requirements should not be sacrificed in order to deliver the affordable homes target. To avoid ambiguity and to lower the risk of key infrastructure not being delivered, a detailed IGS Infrastructure Delivery Plan should be agreed with developers and in place prior to any site development commencing.**

Para 6.8 Objective 3(b) The proposed CS remains unclear on whether the jobs target applies to Ipswich Borough or Ipswich Policy Area and what "in the region of 12,500 jobs" actually means? How will we know if the jobs target has been met if it is not clear what it actually relates to? To illustrate the point, with the recent IBC acquisition of employment land (the disused sugar beet factory) outside the Borough will the creation of jobs on that site count towards IBC's target or Babergh's?

Recommendations **See the above in the summary on page 5**

Para 6.17 With respect to "Delivery of a sustainable urban extension on greenfield land at the Ipswich Garden Suburb will also occur during the plan period (see policy CS10)", we suggest this will be an unachievable goal due to the severe damaging impact it will have on the already congested roads of Ipswich and impact on air quality. Although Suffolk County Council plan to commission a feasibility study in 2015 into the possibility of providing relief roads in/to the north Ipswich and IBC would like to "actively encourage key partners to investigate the possibility of a northern bypass" (Para 8.213), by their nature such developments are expensive, take a long time to plan and implement. The outcome in both technical & financial feasibility is by no means certain. Without such infrastructure the effectiveness of the CS to deliver the IGS appears small and as such the CS is unsound and should be rejected.

¹³ For example the proposed large storage tanks under Henley Rd and additional pumping stations contained in the CBRE outline planning application for its IGS site.

Recommendation The effectiveness of the CS to deliver the Ipswich Garden Suburb over the plan period is questionable and consequently the CS is unsound and should be rejected. IBC needs to include alternative proposals based on co-operation with neighbouring LAs, as indicated above, to deliver the housing targets and, as a matter of urgency, to press ahead with SCC and the Local LAs to produce an action plan for assessing the feasibility of road improvements such as a north Ipswich relief road or bypass. The latter should be followed by the joint development of a business plan and a delivery plan.

Para 8.21 We note “The Haven Gateway Water Cycle Study Stage 1 Report identified issues with water supply and sewerage in Ipswich”. Whilst accepting the important role that SUDs has to play, the CS fails to take sufficient account of the waste water issues arising from the proposed expansion of Ipswich. Para 6.92 of the NALEP draft Strategic Plan, January 2014 recognises 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 Ipswich Chapter of the Water Cycle Study (WCS) (by Royal Haskoning for Haven Gateway, 2009¹⁴) concludes that:

- Existing sewage treatment capacity for residential and commercial development reaches capacity in 2014/15.
- Significant infrastructure upgrade is required for wastewater over the entire timeframe ie 2009 onwards.
- The draft Water Framework Directive classification for the area (Environment Agency, 2009) surrounding the Cliff Quay STW is "poor" (pg6-10).

The WCS shows Cliff Quay with a lack of headroom to cope with the projected growth of both housing and employment over the study period and therefore it is categorised as 'red'. On the basis of the planned development Cliff Quay will exceed its consent in 2014/15, reaching a maximum of almost 29% exceedance by 2020/21. The WCS states that Anglian Water has identified the main problems and restrictions in the system as being related to the volume of surface water discharge entering their combined sewer systems, resulting in flooding and the underperformance of a Sludge Treatment Centre which impacts heavily on the STW. Anglian Water consider the Sludge Treatment Centre to be the main limiting factor to the STW and therefore proposed to replace it within AMP5 (Asset Management Plan 2010-15) which they claim will enable the STW to continue within the existing flow and sanitary consent parameters until 2021 and beyond.

In addition, the pipeline capacity from the north of Ipswich to the Cliff Quay STW is at capacity and to date no viable solutions have been proposed for the Ipswich Garden Suburb wastewater infrastructure. The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by a failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the plan period and plan for its provision. This is a major failing of the CS making it unsound.

Recommendation The failure of the CS to identify and plan for key strategic wastewater infrastructure, which could be a ‘show stopper’ for growth, calls into question the effectiveness of the CS to be delivered and makes it unsound. It should be rejected. The soundness of CS can be improved by IBC/IPA making a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure, working with Anglian Water on the identification of

¹⁴ http://www.ipswich.gov.uk/downloads/Haven_WCS_Stage_2_-_Ipswich_specific_results.pdf The UKPI uses a subset of the internal peace indicator rates (per 100,000 population) from the Global Peace Index including Homicide, Violent Crime, Weapons Crime and Perceptions of Crime, Police Officers.

key infrastructure deliverables and incorporating them into the CS infrastructure tables. The growth figures might need to be revised accordingly.

Para 8.28 & Policy CS2 We support the strategy of urban renaissance in central Ipswich (Policy CS2) and note the first bullet point in Para 8.28 'It will maximise opportunities to re-use previously developed land within central Ipswich.' The proposed removal of the 60% target for development on PDL 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. 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.

Recommendation For improved effectiveness and soundness we recommend a target be retained for the use of previously developed land accepting that it will be lower than the current CS. This could be reduced over time.

Para 8.52 states "The Stour and Orwell Estuary Special Protection Area is protected under the Habitats Directive due its importance for bird populations. The Local Plan has been subject to an Appropriate Assessment under the Habitats Directive. This concluded that visitor numbers to the Orwell Estuary will increase as a result of growth in the Ipswich Policy Area and could adversely affect the Estuary's Special Protection Area for birds. Measures to avoid and mitigate any such potential impacts are included in the plan." The main mitigation included in the CS is the delivery of the new Country Park in the IGS by 2021. Table 8B states in relation to the Country Park "Completion and land transfer of initial ancillary works to include visitor facility / community centre and works compound is dependent on the occupation of 500 dwellings in Henley Gate." If only 499 homes or less are built on Henley Gate, there is no mechanism to secure the delivery of the Country Park by 2021. Likewise both the other two parts of the IGS could be fully built out long before the Country Park is delivered. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European designated site. This is non-compliant with Para 2.8 of the CS.

Recommendation The CS cannot guarantee the delivery of the Country Park in a timely manner to ensure compliance with Para 2.8 i.e. the plan cannot demonstrate that it will not adversely affect the integrity of a European designated habitat. As such the CS is unsound and should be rejected. This can be overcome either by specifying a firm delivery date for the Country Park or the delivery on a sequential basis as the IGS is built out. (However, it is difficult to see how the latter is possible, as the CS no longer proposes a sequential approach for the delivery of the IGS and we question whether the IGS without major new road infrastructure will be developed.)

We also note that the Habitat Regulation Assessment (HRA) screening report for the CBRE/Mersea Homes IGS planning application also concluded that the development is likely to result in a significant effect on the Stour and Orwell Estuaries Special Protection Areas and RAMSAR sites and proposes a mitigation strategy. Page 20 of the HRA states "Importantly, in order to be effective that defined areas of the Country Park relating to each of the residential developments of the Garden Suburb would need to be delivered in advance of occupation of the first dwelling". In order to be effective, the delivery of the Country Park cannot be dependent on the occupation of the 500th home in the Henley Gate development. If the Henley development fails to come forward in a timely manner, or is curtailed just below the threshold for the delivery of the Country Park then the mitigation strategy will completely fail. Until the Country Park is operational there is no effective mitigation strategy and it would appear that IBC would therefore be in breach of European legislation and would be prosecuted accordingly.

Recommendation For soundness, Policy CS10 and Infrastructure Table 8B) need to be revised to ensure there is an effective mitigation strategy in place to prevent population growth negatively impacting on the Stour and Orwell Estuaries Special Protection Areas and RAMSAR sites.

Para 8.70 states “The Council recognises the importance of joint working on Ipswich Policy Area matters. At present this is achieved through joint working on evidence base documents to inform development plan documents.” Please see our earlier comments on ‘Duty to Co-operate’. We find no public evidence of any strategic policy outcomes from the IPA. There are no published joint topic papers on housing growth, jobs growth and strategic infrastructure including addressing well know issues such as roads, fresh water and foul water. Despite repeated requests, these evidence based documents referred to in 8.70, have not been made available to the general public so we are unable to fully assess the evidence base underpinning the CS, which is in breach of the legal requirements of the Development Plan Document process. We want the CS to better ensure effective cooperation between IBC and neighbouring authorities.

Recommendation For the CS to be effective it should incorporate strategic policy outcomes on housing, jobs and infrastructure produced from joint working with other LAs via the IPA Board, particularly as Ipswich is a constrained Borough and there is need for close co-operation. There is no evidence of any such outcomes and so the CS is unsound and should be rejected. To be legally compliant, joint working evidence based documents need to be made available to the general public as part of the CS examination.

As an example of how effectiveness can be improved, an inspection of the jobs growth forecasts from the Core Strategies of Babergh, Mid Suffolk, Suffolk Coastal and IBC (revised unadopted version) show that the combined CS forecast jobs growth is 26% higher than the total forecast by the EEFM 2015 data, which are based on high and unrealistic population forecasts, across these authorities, There is a risk that the individual jobs targets of each local authority are unrealistic when compared to the total potential across the four authorities.

Recommendation IBC needs to work more closely with neighbouring authorities to produce more realistic jobs targets that do not double count the potential for new jobs. The CS cannot be deemed sound until the results of the joint working are published and fully considered accordingly.

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, there are a number of flaws in these forecasts and these include:

- The data is not up to date. As an example the ONS migration data for Ipswich used in the Council’s study only went up to 2010/11 and an average of the previous 5 years was used at 404/year over a 20-year period. Contrast this with the latest ONS forecast¹⁵ that forecasts no net migration from 2012 to 2031 for Ipswich. The targeted reduction in “benefits migration” endorsed by all political parties means that immigration will be driven by economic migrants moving to those places with the best jobs and highest wages. Unfortunately this is not

¹⁵ <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/rft-projected-coc.xls>

Ipswich and hence shows that the Trend Migration scenario is flawed and should be rejected. The latest ONS population forecasts need to be used in the calculation of housing demand in order for the CS to be sound. If this is not the case, then IBC must identify what measures it intends to take to attract more immigrants to Ipswich than the ONS forecasts, in line with its Trend Migration scenario.

- The Department of Communities and Local Government's (DCLG) are expected to produce household projections in February 2015 based on the latest ONS forecasts referred to above. These should be used to revise the IBC CS housing targets.
- IBC has used a baseline household data figure of 58,700 that 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 nor the figure of 57,200 contained in EEFM 2015. It needs to be lowered accordingly and the analysis revisited.

Recommendation **The CS is currently unsound since it does not use the latest forecast population and household data. IBC should revisit the Ipswich Population and Household projections and revise the household target giving proper consideration to the latest data from the ONS and the DCLG, the latter being expected in February 2015.**

Para 8.99 We note that Section 17 'Core Planning Principles' of the NPPF states 'encourage the effective use of land by reusing land that has been previously developed land (PDL). A Ministerial Statement has recently reinforced this¹⁶. The proposed removal of the 60% target for development on previously developed land 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. 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.

Recommendation **For improved effectiveness and soundness we recommend a target be retained for the use of previously developed land accepting that it will be lower than the current CS. This could be reduced over time.**

Para 8.102 As we pointed out to IBC during the previous CS consultation, selectively referencing para 47 of the National Planning Policy Framework in this way gives the impression that the Council has no option but to comply, whatever the consequences. This is misleading since NPPF para 15 adds the qualification "as far as is consistent with the policies set out in the Framework". One such policy is 'sustainability'.

Recommendation **We recommend Para 8.102 be reworded to include "as far as is consistent with the policies set out in the Framework".**

Policy CS10: Ipswich Garden Suburb

IBC pins much hope on the Ipswich Northern Fringe being developed as an urban garden extension (referred to as Ipswich Garden Suburb (IGS)) providing approximately 3,500 new homes. However there are two major issues in addition to that relating to the Country Park that could scupper this plan or severely constrain the development and these need to be fully recognised in the CS:

¹⁶ http://www.parliament.uk/documents/commons-vote-office/March_2014/6th-March/1.%20DCLG%20Local%20Planning%20.pdf

- The Traffic Assessment submitted by CBRE/Mersea Homes¹⁷ as part of its planning application shows that traffic from the IGS will have a severe adverse impact across the whole of the north of Ipswich and the town centre, see the attached appendix. In their response to the CBRE/Mersea Homes Hybrid Planning application¹⁸ Suffolk County Council (SCC) state *“Even with the lack of information and methodological flaws, the results indicate that the development has a severe impact on network performance and travel times.”* Unfortunately, mitigating proposals from IBC assume a modal shift onto public transport to the town centre, cycling and walking but this appears unrealistic as the key identified employment growth sites are not in the town centre and not easily reached by sustainable transport (CS5 refers). We welcome the recent proposal by SCC to appoint WSP to undertake a study into possible solutions for the road network around the Northern Fringe, including the feasibility of some form of northern relief road, since the lack of new road capacity on already heavily congested roads does not appear to us a viable solution. This is long overdue and the outputs of this must be taken into account in the CS in order for it to be sound. We also note the concerns of SCC in the Cabinet’s paper¹⁹ on its response to IBC’s Local Plan which states *“More recent assessments of the planning application for proposed development in the Northern Fringe have, however, suggested that there are not, currently, identified sustainable transport measures to ensure that the development impacts are adequately mitigated. Given the key role of the northern fringe, this makes it more likely that the planned development could give rise to severe traffic congestion across the town’s road network.”* These views need to be taken into account. We also note that there has not been any traffic assessment of the effect of multiple starts across the Northern Fringe as proposed in the CS. This is unsound and needs to be undertaken before multiple starts can be contemplated.
- The wastewater pipeline from the north of Ipswich to the main treatment works is at capacity and despite this problem being known about for some considerable time, no viable solution has emerged. This could be a ‘show stopper’ in terms of both the timescales for a technical solution and the financial viability of the project but it is not acknowledged in the CS.

It is unsound to allocate the entire Ipswich Northern Fringe when its delivery may not be viable over the timescales of the plan.

Recommendation **It is unsound to allocate the entire Ipswich Northern Fringe when its delivery may not be viable over the timescales of the plan and so the CS is unsound and should be rejected. To lower the dependency of the CS on the IGS, it should include a ‘Plan B’ based on co-operating more closely with neighbouring local authorities to locate new homes nearer to identified employment growth sites. This would offer a more sustainable solution than building on the Ipswich Northern Fringe, which is remote from major sites of new employment and not connected by sustainable transport. Such a plan could serve as an exemplar of effective joint working on cross-boundary strategic issues.**

We are pleased that the CS Sustainability Appraisal (SA) (section 4.3.1.) now recommends “that updated traffic modelling is undertaken and that all future applications continue to thoroughly assess the cumulative effects of traffic and emissions and propose robust mitigation in line with

¹⁷ Table 11.2 page 92 CBRE Mersea Homes Transport Assessment Hybrid Planning Application Prepared by Croft transport Solutions July 2014

¹⁸ Para 46 page 8 Suffolk County Council (Consultee Code ETPR01) submission to Planning Application 14/00638/OUTFL

<https://ppc.ipswich.gov.uk/xappncons.asp?pageNumber=5&iapplID=14%2F00638%2FOUTFL&>

¹⁹ Agenda Item 6, SCC Cabinet 24/02/15.

other policies within the Core Strategy and the Garden Suburb SPD.” Without updated traffic modelling there is insufficient evidence to demonstrate that the proposed CS is sound.

We have concerns that the sustainable transport proposals may be undermined by existing constraints as evidenced by recent comments from the Head of St Helen’s Primary school in relation to cycling “The view from the highways and local police is that the roads are too dangerous and so they won’t agree to promote cycling to the school and they weren’t able to put in cycle paths.” IBC needs to provide evidence on how it intends to make existing roads safe for cycling and to create new cycle routes to schools such as St Helens.²⁰

Recommendation Without updated traffic modelling, including an assessment of the effects of multiple starts, and the results of the WSP work there is insufficient evidence to demonstrate that the proposed CS is sound and it should be rejected. IBC needs to undertake further traffic modelling as stated in the SA to show that the IGS development will not result in severe traffic and air quality impacts in order to show that the CS is effective and sound. Until then it cannot be adopted.

Section 4.3.3 of the SA rightly identifies that “It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17²¹ and the Travel Ipswich Scheme.” However, the proposed removal of the requirement in the adopted CS for sequential development of the IGS to allow multiple starts will make this difficult to implement and is a high risk strategy. Through a sequential approach adverse impacts can be identified and steps taken to require developers to implement further mitigation measures or restrict further development if this is not possible. However, it is not clear how a multiple start approach will allow DM17a and DM17b to be implemented. In order to be sound and IBC needs to detail how it will comply with DM17a and DM17b if significant effects occur. In order to be effective, IBC also needs to specify how it will judge whether an effect has “a significant adverse impact”. A sequential approach is much safer since it allows parts of the IGS to be finished before the next phases commenced. In the event of significant adverse effects beginning to arise, the development can be halted in a controlled way rather than having one large unfinished building site, waiting say major external infrastructure such as relief roads.

Recommendation

- **The proposed removal of the requirement in the adopted CS for sequential development of the IGS is unsound (as ruled by the Government Inspector during the previous CS hearings) and as such the CS should be rejected. Multiple starts make control of cumulative traffic and air pollution effects much more difficult than a phased approach where new phases can be halted if shown to be unsustainable without additional mitigation strategies. This can be overcome through retaining a sequential (phased) approach to the development of the Ipswich Garden Suburb.**
- **‘A significant adverse impact’ is not defined, nor how it will be measured and judged. This impacts on the effectiveness of the CS and makes it unsound. It can be overcome by addressing these points.**

²⁰ Ipswich Evening Star 24/02/15

http://www.ipswichstar.co.uk/news/ipswich_mum_criticises_st_helen_s_primary_school_for_discouraging_children_to_cycle_1_3969548

²¹ Policy DM17 states that to promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall not result in a significant adverse impact on rights of way or the local road network in respect of traffic capacity, highway safety, air quality or the four AQMAs.

Policy CS12: Affordable Housing

Viability underpins the National Planning Policy framework. We note that CS 12 states '*This will be achieved by requiring new development at the Ipswich Garden Suburb to provide for at least 35% on-site affordable housing by total floor space.* However, Para 4.2 of the IBC response to the Ipswich Viability Report produced by Peter Brett & Associates in December 2014 states '*The indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure.*' Clearly it is unsound to set a target of 35% when the viability report indicates 28%. We understand that the IGS infrastructure costs were developed mainly in the summer of 2013. Since then additional costs appear to have emerged due to wastewater infrastructure²² and we would expect similarly for highway changes. A realistic and achievable target needs to be set for affordable homes that will not compromise the identified infrastructure requirements for the IGS. To avoid ambiguity and to lower the risk of key infrastructure not being delivered, a detailed IGS Infrastructure Delivery Plan should be agreed with developers and in place prior to any site development commencing.

Recommendation **The target for affordable homes on the IGS should be set at a realistic level that will not compromise the identified infrastructure requirements. For soundness, it should initially be set at an indicative level proposed by the viability report subject to revision as the IGS infrastructure costs become clearer. The quality of the development and infrastructure requirements should not be sacrificed in order to deliver the affordable homes target. To avoid ambiguity and to lower the risk of key infrastructure not being delivered, a detailed IGS Infrastructure Delivery Plan should be agreed with developers and in place prior to any site development commencing.**

Para 8.124 This paragraph risks concentrating affordable housing in certain phases rather than integrating affordable housing throughout the development. We are concerned about a concentration of council housing that will fail to create sustainable, inclusive and mixed communities" in accord with the NPPF. In this respect we note that IBC's planning application for Ravenswood has been called in for inspection on this issue.

Recommendation **There should be a clear goal of integrating affordable housing throughout the developments including the IGS. This needs to be added to the CS to make it sound.**

Policy CS13: Planning for Jobs Growth

Growing the economy is one of the biggest challenges IBC faces. In a recent Cities Outlook 2015 report²³, which analysed the economy of 64 UK Cities that included Ipswich, although Ipswich is not officially a city, it noted that over the 10-year period 2004 to 2013 in percentage terms Ipswich experienced the 8th highest population growth, the 3rd highest housing growth but lost 1,095 jobs. Clearly it is unsustainable to continue this trend unless Ipswich is to become a commuter town underpinned by sustainable transport routes to employment sites that are an attractive option for commuters. However, the latter is not contained within the CS Vision or policies.

Between 1991 and 2011 jobs in Ipswich grew by 1,145 jobs equating to 57 jobs per year (paragraph 30 of IBC's Employment Topic Paper) whereas the EEFM models are now forecasting that from 2011 to 2031 they will grow by an average of 625 jobs per annum approximately 11 times as fast! IBC is asking us to believe that it will create more jobs in the Borough in the next two years than have been

²² For example the proposed large storage tanks under Henley Rd and additional pumping stations contained in the CBRE outline planning application for its IGS site.

²³ Centreforcities Cities Outlook 2015 report published 19th January 2015.

created in the last 20 years and continue this rate thereafter. Unfortunately this is simply not credible. Clearly substantial and ongoing investment is required to facilitate jobs growth in the town centre and the CS needs to identify these requirements and include additional measures to make this happen otherwise it will fail to deliver the new jobs that the town centre needs.

In a similar vein the EEFM 2015 data is forecasting the population of Ipswich will grow at double the rate that has occurred over the past 20 years, which is also massively higher than the Trend Migration population forecast that IBC is proposing to adopt. A key question must be 'are these forecasts plausible or sustainable'. We would argue they are not. The top jobs growth sectors (greater than 1000 jobs over the period 2011 -31) in decreasing order are Business Services (95%); Professional Services (77%); Health & Care (15%); Retail (23%); Employment (60.2%); Accommodation & Food (34%) and Construction (30%). In our opinion the high growth rates for business, professional and employee services are questionable and need further examination. The 3 largest jobs loss sectors are Manufacturing (-27%); Public Administration (-15%) and worryingly Finance (-7%), since the latter is a key sector for Ipswich and a target growth in the New Anglia Local Enterprise Partnership Strategic Economic Plan and Suffolk Growth Strategy.

It becomes apparent from the above that the key driver is population growth consumer services such as retail, health & care and services linked to general employment. National and international services such as finance & insurance, manufacture and agriculture are predicted to decline. Whilst we have a certain sympathy for both IBC and Suffolk County Council in interpreting forecasts from expert groups such as Oxford Economics (creators of the EEFM), they need to gain a better understanding of what lies behind the forecasts and add local knowledge rather than accepting the data as fact.

Worryingly, the EEFM 2015 forecasts a significantly larger population in 2031 of 162.8 k compared to the latest ONS projection of 152k and the Trend Migration Scenario of 154.7k adopted by IBC in the CS. This difference of 8.8k– 11.5k is substantial. Using a much higher population forecast to estimate the number of jobs than that used to estimate new homes growth is fundamentally flawed and hence the CS is unsound. IBC needs to work with Cambridgeshire Insight (custodians of the EEFM) to understand how forecast jobs growth data will be affected if the EEFM population growth is aligned with the latest ONS data.

The EEFM forecast Ipswich main growth sectors do not align well with the priority jobs growth sectors identified in the NALEP 2014 Strategic Economic Plan. The proposed CS remains unclear on whether the jobs target of "in the region of 12,500 jobs" applies to Ipswich Borough or Ipswich Policy Area and what it actually means? How will we know if the jobs target has been met if it is not clear what it actually relates to?

Recommendation Without properly defined specific and measurable jobs growth objectives the CS is unsound and should be rejected. Assuming IBC intends to help grow jobs outside the Borough in association with the IPA then to improve effectiveness and clarity two jobs targets are required in the CS

- The first for the Borough of Ipswich, in a similar manner to and linked to the homes target to achieve sustainability. A measurement indicator should be specified such as the ONS Annual Business Survey and/or Business Register and Employment Survey. If the current form of wording is used then 'in the region of' needs to be defined.
- The second for how IBC will help to create jobs in neighbouring LAs within the IPA. Consideration will need to be given to how success can be measured locally since government data will not be available and the IPA Board does not appear to be currently monitoring this.

We are pleased that IBC has taken our advice and better aligned its target employment sectors with NALEP and the Suffolk Growth Strategy. However a recent study²⁴ into the viability of the Ipswich Development Plan calls into question the viability of developing new offices, industrial units and warehousing in Ipswich. Para 8.3.2 states “none of the office development scenarios are viable” and Para 8.5.1 “industrial and warehouse development in Ipswich is not viable”. This is particularly worrying as the Haven Gateway Employment Study identified that the commercial office stock in Ipswich town centre was out of date and not attractive to employers. We want to see new jobs being created in the town centre and support the aspiration of IBC to attract A class office development in the corridor from Ipswich Station to the Town centre but it is not clear that this will be sufficient to deliver the jobs growth target in the CS and whether such a target is achievable without substantial government enterprise funding and improved transport infrastructure that make Ipswich more attractive to potential employers. In order to be effective and sound the CS needs to identify the level of funding required, when it will be needed and how it will be secured.

Regarding retail development in Ipswich, the study found (Para 8.7.5) “It shows that both comparison retail scenarios and small format convenience retail are marginally viable. However, large format convenience retail is not viable.” The latter challenges the deliverability of a large retail offering on the former Westgate site. We are concerned on the over reliance of the Retail Sector for jobs growth and do not believe that the EEFM 2103 forecast of a 23% 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 2013²⁵) 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.” Ipswich Central also 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.”

The above study calls into question the effectiveness of the CS to deliver the jobs target for Ipswich especially new jobs in the town centre. The CS has failed to acknowledge these severe obstacles to jobs growth and to put forward proposals on how they may be overcome. As such the CS is unsound. We want to see the inclusion of further measures in the CS that will help improve the Retail offering in Ipswich and deliver new jobs.

As previously mentioned, Policy CS13 states that IBC will “focus on the delivery of jobs within the Borough” but fails to mention the acquisition of the disused sugar beet factory, which is designated employment land, and how this will fit into the employment strategy. We note that this acquisition does not feature within the currently adopted CS, does not feature in the revised CS, is outside the Borough and is likely to deflect management attention away from growing jobs in the Borough. This needs to be explained. The cost of this acquisition, debt servicing and the cost of developing infrastructure on this site is material and in our view is non-compliant with Policy CS13.

Recommendations **The CS is unsound and should be rejected. To improve the soundness of the CS IBC needs to:**

- **Address the severe obstacles to jobs growth identified by the Peter Brett & Associates report and how they might be overcome.**

²⁴ Viability Testing for the Ipswich Development Plan, Peter Brett Associates December 2014

²⁵ http://ipswichcentral.com/IPS-CENTRAL-X-FUND-PRESENTATION_D3-02_012518.pdf

- Explain how the recent strategic acquisition of the sugar beet site fits into the CS and revise the CS accordingly.
- Take account of the large difference in population forecasts in the EEFM model from the ONS and Trend Migration forecasts and how this will impacts on the jobs forecasts.
- Review the forecast growth of the business services, professional services and retail sectors which seem particularly high.

POLICY CS16: Green Infrastructure, Sport and Recreation

Please see our comment regarding Para 8.52 and the Ipswich Garden Suburb Country Park.

POLICY CS17: Delivering Infrastructure

Para 8.177 states ‘It is critical that Ipswich receives the infrastructure it needs to support the delivery of both housing and jobs growth, and to ensure that existing communities can be sustained. It is important that growth should bring benefits to, and not adversely affect the quality of life of, existing communities.’ We fully support this goal but are concerned that the proposed development of the Ipswich Garden Suburb without adequate new road infrastructure will severely impact on traffic congestion and air quality and adversely affect the quality of life of residents. See comments and recommendations under CS10.

Para 8.180 As pointed out in our comments regarding Para 8.21, key to the planned growth of Ipswich is the provision of strategic wastewater infrastructure including the upgrading of the sewage treatment works at Cliff Quay, the Anglian Water ‘ES3 Ipswich water reuse’ project which requires vital infrastructure and to provide a solution for the Ipswich Garden Suburb. Apart from upgrading sewer pipelines in the north of Ipswich there is a possibility that the latter will require a major new pipeline to be laid from the Ipswich Garden Suburb to Cliff Quay. It is not sufficient for the CS to use the ‘catch all’ heading of “utilities” as the CS will obviously fail to deliver without such key strategic infrastructure. Similarly the Transport Assessment studies to date indicate that some form of relief road or northern bypass will be required in the north of Ipswich to ensure the quality of life of the town is not severely affected and we note and support in the inclusion of Para 8.213.

Recommendation **The failure of the CS to identify and plan for key strategic wastewater infrastructure, which could be a ‘show stopper’ for growth, calls into question the effectiveness of the CS to be delivered and makes it unsound. It should be rejected. The soundness of CS can be improved by IBC/IPA making a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure, working with Anglian Water on the identification of key infrastructure deliverables and incorporating them into the CS infrastructure tables 8A and 8B.**

Policy CS20: Key Transport Proposals

We fully support Para 8.213 although disagree with the comment “it is not practical to include such a route within this Strategy”. In our opinion, without such a route the CS will fail as it is difficult to see how SCC and even IBC could support the development of the Ipswich Garden Suburb due to the severe traffic congestion that will arise in the town and potential damaging impact on air quality. We accept that the provision of such a road is outside the power of IBC and depends upon SCC, other Local Authorities within the IPA and possibly Government. However, this is no different to many other aspects of the CS where IBC has no control but only the power to influence, including jobs growth, housing growth and strategic wastewater infrastructure. Its inclusion in the CS would serve as an exemplar for the IPA on the ‘Duty to Cooperate’.

Recommendation The effectiveness of the CS to deliver the Ipswich Garden Suburb is doubtful without additional road capacity via a northern bypass or a link road to the north of the town. Consequently the CS is unsound and should be rejected. The soundness can be improved by IBC working with IPA partners on alternative sites for homes growth as outlined above. Also by including in the Transport Proposal a statement that IBC will work with SCC and LAs within the IPA to provide an action plan with the goal of providing additional road capacity via a northern bypass or a link road to the north of the town.

DM3: Provision of Private Outdoor Amenity

We note the proposed rewording of DM3 from that currently adopted CS for houses, bungalows and ground floor maisonettes. Currently the minimum dimensions refer to 'rear garden area' and the proposal is to change this to 'private garden area'. We object to this change since it will result in much smaller dwelling plots, some with no rear gardens at all and more cramming together of properties including infill. We welcome the stipulation in Para 9.21 that 'Garden sizes need to be calculated independently of any parking space(s) to be provided.'

Recommendation Change 'private garden area' back to 'rear garden area' for all houses, bungalows and ground floor maisonettes, else this will result in much smaller dwelling plots, some with no rear gardens and more cramming together of properties that will impact on the attractiveness of the town.

DM17: Transport and Access in New Developments

We support Para 9.96 and the bullet points immediately above, however, it remains unclear how 'significant adverse impacts' referred to in bullet point a. ('not result in a significant adverse impact on rights of way or the local road network in respect of traffic capacity, highway safety') will be defined. Similarly for CS17 b., which refers to air quality, although in this case there are maximum legal limits for particulates and nitrous oxides.

Recommendation IBC needs to specify in the CS how a 'significant adverse impact' will be judged else it will be ineffective and unsound.

TABLE 8A Major Infrastructure Proposals

Recommendation Include key strategic wastewater infrastructure (see comments in Para 8.180) else the CS will be ineffective and unsound.

TABLE 8B Strategic and Neighbourhood Infrastructure Requirements for the Ipswich Garden Suburb

Although the problem has been known about for a long time, there is still no agreed viable solution for wastewater infrastructure. Apart from upgrading sewer pipelines in the north of Ipswich there is a possibility that a major new pipeline will require to be laid from the Ipswich Garden Suburb to Cliff Quay (see comments in Para 8.180).

Recommendation Without an agreed viable solution for key strategic wastewater infrastructure required for the development of the Ipswich Garden Suburb, the effectiveness of the CS to deliver the IGS and housing growth remains doubtful. Hence the CS is unsound and should be rejected. A viable solution needs to be identified and included in Table 8B.

Country Park Table 8B states in relation to the Country Park “Completion and land transfer of initial ancillary works to include visitor facility / community centre and works compound is dependent on the occupation of 500 dwellings in Henley Gate.” If only 499 or less homes are built on Henley Gate, there is no mechanism to secure the delivery of the Country Park by 2021. Likewise both the other two parts of the IGS could be fully built out long before the Country Park is delivered. If the Country Park is delivered late or not delivered at all this will adversely impact on the integrity of the Stour and Orwell Estuary Special Protection Area, a European designated site. This is non-compliant with CS Para 2.8 ‘A plan may only be approved if it can be shown that it will not adversely affect the integrity of a European designated habitat’ as there is no certainty of this happening.

Recommendation The CS cannot guarantee the delivery of the Country Park in a timely manner to ensure compliance with Para 2.8 i.e. the plan cannot demonstrate that it will not adversely affect the integrity of a European designated habitat. As such the CS is unsound and should be rejected. This can be overcome either by specifying a firm delivery date for the Country Park or the delivery on a sequential basis as the IGS is built out. (However, it is difficult to see how the latter is possible, as the CS no longer proposes a sequential approach for the delivery of the IGS and we question whether the IGS will be developed without major new road infrastructure.)

OBJECTIVE 3: Homes and jobs targets

Please see our comments regarding Para 6.8 Objective 3(a) and Objective (3b).

Recommendations Clear and specific objectives are required for homes and jobs growth for the Borough of Ipswich else the CS will be ineffective and unsound. Additional objectives can be specified for outside the Borough and in relation to the IPA but these should not be used to blur the former and it is not clear how data will be obtained. Regarding jobs growth ‘in the region of’ is not defined and a specific target or targets (e.g. greater than x with a stretch target of y) should replace this phrase. The targets for homes and jobs growth need to be in balance to be sustainable. The targets should be revised in line with the latest ONS data.

Recommendation An indicator for jobs creation needs to be included and it is suggested the Government annual Business Register & Employment Survey should be specified. This breaks down data to the Local Authority Level and enables a year-by-year comparison. Should IBC wish to set a jobs creation target for jobs created outside the Borough and within the IPA the CS should state what indicator would be used to measure progress.

OBJECTIVE 6: Modal shift

Recommendation The CS relies heavily on a transport modal shift from cars to more sustainable modes such as walking, cycling and public transport. This will be challenging and it is suggested that an additional indicator of the Census travel mode to work data be included to improve soundness.

OBJECTIVE 10: To tackle deprivation and inequalities across the town

This is an important issue for many people in Ipswich and deserves attention. The target is very unambitious - simply waiting until nearer 2031 and aiming to improve the rank of Ipswich by one place would achieve the current target! Low income in Ipswich is a key factor in deprivation but is not included as an indicator. This needs to be corrected. The CS needs to be more effective in tackling this issue

Recommendations Include average wages and the rank of Ipswich in the indices of multiple deprivations as indicators. More ambitious and specific time related targets for continuously improving the latter should be used.

OBJECTIVE 12: To work with other local authorities in the Ipswich Policy Area and with community partners to ensure a co-ordinated approach to planning and development.

The proposed indicator is vague and gives no measure of beneficial outcomes from working together on jobs growth, housing growth or strategic infrastructure.

Recommendations The proposed indicator is vague and will not be effective in making the CS compliant with respect to the 'Duty to Co-operate' legislation. It is recommended

- Indicators should be defined to include joint topic papers, work programmes and definable outcomes relating to jobs growth, housing growth and strategic infrastructure arising from co-operative working within the IPA.
- Ideally the target should be more specific, but as a minimum the following modification to the current target is proposed 'To achieve effective cross boundary working on housing growth, jobs creation and strategic cross boundary infrastructure including green space.'

Rod Brooks & Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group²⁶

3rd March 2015

Issue 1

²⁶ 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.

Appendix Ipswich Garden Suburb Transport Assessment

The impact of the proposed development of the Ipswich Garden Suburb on our already heavily congested roads is a major concern for residents and road users. Croft Transport Solutions submitted a Transport Assessment in July 2014 as part of a Hybrid Planning Application (14/00638/OUTFL) by CBRE/Mersea Homes for the Ipswich Garden Suburb. Suffolk County Council in their representation in response to the planning application²⁷ stated in Para 46 “*The development is shown to have a significant impact on the network, with the network reaching a standstill in many of the PM peak scenarios*” and in Para 48 “*Even with the lack of information and methodological flaws, the results indicate that the development has a severe impact on network performance and travel times, especially in the evening peak period with some routes experiencing increases in delay of 15 minutes in 2021 and more than 30 minutes with the full northern fringe development in 2027.*” For information, Table 11.2 of the above assessment has been reproduced below for the 2027 PM peak hour, full Ipswich Garden Suburb and proposed mitigating highway improvements in place.

The Table lists 16 road links with increases in journey time of 4 minutes or above per km. The delay between the Norwich Rd roundabout and Henley Rd traffic lights (link 154) without/with the Garden Suburb development is expected to rise from 5.27 min/km to 14.1min/km giving a delay of 15.5 min for the 1.1km link with the Garden Suburb. The town centre is also significantly affected and as an example, from the top of Argyle Street to St Helens St/St Margaret’s Plain (link 173) the forecast delay rises from 11.75 min/km without the Garden Suburb to 34 min/km i.e. a delay of 17 minutes for the link with the Garden Suburb. Anglesea Rd to the bottom of Berners St (link 104) rises from 8.6min/km to 24 min/km i.e. a delay of 12 minutes for the link. The time taken to travel just 100m on some of the links also looks particularly disturbing e.g.7.37 minutes on route 125; 5.36 minutes on route 131; 5.22 minutes on route 132; 4.46 minutes on route 173 and 3.1 minutes on route 104. This shows that traffic is virtually stationary.

The road network will be unable to handle any form of breakdown, accident, roadworks or emergency. Emergency vehicles will struggle to pass through this level of congestion and will put human lives at unacceptable risk. The only possible conclusion is that Ipswich will be subject to gridlock on an almost daily basis, detrimentally impacting on business and resulting in unacceptable air pollution. Bearing in mind these figures assume trip rates 43% lower than the sensitivity models recommended by SCCs consultants AECOM and do not take account of some of the forecast population and jobs in the Ipswich Core Strategy, do not take account of any forecast growth in neighbouring towns and villages, the situation will be far worse. **This is not sustainable and the Ipswich Garden Suburb should not be developed until the necessary road infrastructure is put in place to handle the traffic and avoid gridlock.**

Additional Comments:

- The modelling analyses the traffic impacts on 4 key routes, namely Tuddenham Rd into the town centre, Henley Rd down to the waterfront, Woodbridge Road through to Norwich Rd and the A1214 bypass from the hospital through to the Ipswich railway station. A key omission is a route encompassing Westerfield Rd since most of the traffic from the Garden Suburb will leave/enter the Garden Suburb from this road.
- Paragraph 9.3.1 of the Transport Assessment states that “*The 2021 and 2027 base assessments include only those developments and/or transport infrastructure elements that are fully committed, have planning consent and in the case of infrastructure proposals are*

²⁷ See Consultee ETPR01 Strategic Planning Manager (SCC) Paragraph 46
<https://ppc.ipswich.gov.uk/xappncons.asp?pageNumber=5&iappID=14%2F00638%2FOUTFL&>

funded and have genuine delivery timetables.” Clearly this will underestimate traffic flows given the Core Strategy housing and jobs growth plans.

Link	Link Description	Link Length (km)	Journey Time (mins/km) 2027 Reference	Increase in Journey Time (mins/km) Scenario 2B
103	Henley Road SB (between Valley Road and Fonnereau Road)	1.1	3.02	6.81
104	Anglesea Road, Berners Street SB (between Henley Road and A1156)	0.5	8.58	15.48
113	Civic Drive NB (between A1156 and Handford Road)	0.2	6.65	4.14
114	Anglesea Road, Berners Street NB (between Henley Road and A1156)	0.5	6.27	6.87
123	B1077 SB (between Westerfield Road and A1156)	0.3	4.94	5.04
124	A1156 EB (between B1077 and Argyl Street)	0.4	4.47	4.35
125	Argyl Street SB (between A1156 Woodridge Road and St. Helen's Street)	0.1	10.30	7.37
131	Bond Street NB (between Star Lane and A1156)	0.3	8.13	16.08
132	A1156 WB (between B1077 and Upper Orwell Street)	0.2	8.04	10.44
152	Yarmouth Road NB (between B1067 and A1071)	0.7	4.32	6.36
153	A1214 NB (between Norwich Road and B1067)	0.3	5.43	5.89
154	Valley Road NB (between Henley Road and Norwich Road)	1.1	5.27	8.86
162	B1067 EB (between A1214 and A1156)	0.5	5.40	10.88
163	A1156 EB (between B1067 and Berners Street)	0.4	4.81	6.99
165	A1156 EB (between B1077 and Argyl Street)	0.4	4.47	4.35
173	Argyl Street, St. Helen's Street WB (between Woodridge Road and B1077)	0.5	11.75	22.29

**Table 11.2 Links with Increases in Journey Time of 4 Minutes or Above
- 2027 PM Peak with Full Northern Fringe**

- We note that the modelling assumes that the Garden Suburb Travel Plan²⁸ is fully and successfully implemented with “extraordinary” levels of sustainable travel never seen before in Ipswich. However we note from the 2011 Census results²⁹ compared with the 2001 results that the percentage cycling to work in Ipswich is falling not rising. In 2001 it was 5.7% falling to 4.6% in 2011 i.e. a drop of almost 20%. Sensitivity modelling is required to show the impact on traffic with lower rates of sustainable travel.

²⁸ We note that this Plan does not actually exist.

²⁹ <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcM%3A77-353510>

- The Tables shown in Appendix 12 of the Transport Assessment are dated March 11, 2010. This would therefore appear to ignore all trips from any developments after this date e.g. Hayhills, Colchester Rd Fire Station, Waterfront etc. Traffic movements from all additional and planned developments must be incorporated into the analysis.
- The models are based on the 2008 versions when it was assumed that there would be major jobs growth within the town centre and that it would be possible to encourage a model shift to more sustainable forms of transport to the town centre. However, the town centre has not been identified by the 2013 Suffolk Growth Strategy or the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan as a major employment growth site. The only principle employment growth site identified within the Ipswich boundary is the Futura Park/Ransomes Europark expansion, which is located at the opposite end of town from the Garden Suburb. The next two nearest sites are the Former Sugar Beet Factory and Adastral Park. None of these three sites are within easy reach of the Garden Suburb by public/sustainable transport.

Since sufficient jobs growth is unfortunately not forecast in the Town centre then commuting by car would seem inevitable. The model needs to take account of the location of the major employment growth sites around Ipswich and the increased traffic flows from the Garden Suburb to them. To ignore the location of new employment sites and assume that the majority of new jobs will be created in the town centre is simply not credible.

We also note that in 2001 the net commute into Ipswich was 11,767, which has fallen dramatically to 6,171 in the 2011 census³⁰ due to more people commuting out of Ipswich to work. This trend needs to be incorporated into the modelling work.

- The Transport Assessment is also incomplete as it fails to consider the cumulative impacts of growth of the surrounding towns and villages on traffic flows and the road network.

³⁰www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow2&period=0&fix=E07000202&view=475.625,237.8125,78.75,79.375&tr=-136.894775390625,-184.43862915039062&sc=1