



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Comments on the Ipswich Borough Council Proposed Core Strategy and Policies Development Plan Document Review Sustainability Appraisal Report Addendum – Consultation Ending 23rd November 2015

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

We are therefore not surprised that the Sustainability Appraisal (SA) Report Addendum finds 'These changes do not result in any changes to the significant effects identified in section 5 of the Proposed Submission SA Report and no further mitigation measures are considered necessary.'

In addition to the 'Pre-Submission Main Modifications' the SA Addendum considers representations submitted during the previous consultation that ended on 5th March 2015. We are disappointed that a substantial number of key issues raised during the consultation have not been addressed. We want the best for Ipswich with the right policies in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous representations, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough. As an example, the cumulative and synergistic effects of housing and jobs growth, both within and just outside the Borough, on traffic, air quality and climate change assume an optimistic view of 15% modal shift from cars to more sustainable transport options. However, we are pleased to see that some consideration has been given to the cumulative effects of both homes and employment just outside the Borough.

We note the inclusion of the strategic employment site of the disused Sugar Beet factory, which although now owned by IBC, fails to get a mention in the updated IBC Core Strategy. As the largest financial investment by far that the Council has made in Ipswich, clearly the Council will need to give this site major attention and resource in achieving a return on its investment. The impact of this needs to be assessed on the CS in relation to IBC stating that it will focus development on the town centre and in creating jobs within the Borough (as opposed to in Babergh DC where the Sugar Beet site is located).

The SA quite rightly highlights the lack of information and uncertainty in assessing the effects on traffic, air quality and climate change of circa 4000 homes identified in the Core Strategy to be built in association with neighbouring Local Authorities and exposes a hole in the Core Strategy, which needs to be rectified in this review.

Unfortunately the SA still fails to recognise that the delivery of the entire Ipswich Garden Suburb (formerly Northern Fringe) might not be viable and has made no assessment of the sustainability /or

not of a multi-site development approach that might have to be halted midway due to negative impacts on the town, including severe traffic congestion and poor air quality.

Rod Brooks & Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group¹

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