



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Northern Fringe Protection Group Response To The Consultation On The Strategic Environmental Assessment And Sustainability Appraisal Proposed Submission Core Strategy And Policies Development Plan Document

Please find the following comments on the above Sustainability Appraisal (SA) consultation. They should be read in conjunction with our comments on the revised Core Strategy (CS), which should be considered accordingly. We want to see high quality and successful new development in Ipswich to benefit both existing and new residents in a sustainable manner. Current the SA fails to fully assess the true implications of the CS and needs to be revised accordingly in order to be sound.

1. Utilisation of the best available baseline and modelling data

The SA/SEA process requires an examination of the baseline information of the Borough as it is now together with data on how it may change in the future. As we previously commented in the draft CS consultation, the CS and its SA must therefore be based on the best data available. This is still not the case. For example the Appendix B Baseline Data references 2010 air quality data and average weekly pay is taken from the 2011 State of Ipswich Report when more recent data is available and the sports/open space section fails to use data from the Open Space and Biodiversity Policy/Strategy 2013-2023 showing major shortfalls around Ipswich of certain space categories.

As with other data, historic Baseline data to show how the number of jobs within Ipswich Borough has changed over the years needs to be included in Appendix B and an assessment made of how the proposed jobs target relates to historic figures included in the SA. The SA fails to utilise baseline data and subsequent forecasts from the previous DCLG or EEFM 2013 forecasts or the most recent ONS forecasts and the EEFM 2014 runs. Both the CS and this SA are therefore unsound. Most recent population and employment data needs to be utilised and data needs to take better account of specific local issues.

Section 3.1.1 The adoption of the Trend Migration scenario is also flawed as we have detailed in our response to the previous CS consultation. The implicit assumption of the SA that the Trend Migration scenario, which uses obsolete data, is appropriate is unsound and undermines the whole SA process. 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 forecast¹ that forecasts no net migration from 2012 to 2031 for Ipswich. With the reduction in "benefits" migration endorsed by all political parties, economic migrants will move to those places with the best jobs and highest wages; unfortunately this is not Ipswich. 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 migrants to Ipswich than the ONS forecasts.

The Department of Communities and Local Government's (DCLG) produced household projections in March 2015 based on the latest ONS forecasts referred to above showing a demand for 10,434 new homes, far lower than IBC's target of 13,550. This data 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

¹ <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/rft-projected-coc.xls>

DCLG figure of 57,433 (March 2015) nor the figure of 57,200 contained in EEFM 2015. It needs to be lowered accordingly and the analysis revisited. We are surprised that the SA has not identified these data issues and made recommendations to improve the baseline data. The SA needs to make an assessment of the impacts of IBC's intention to deliver 13,550 new homes when the evidence illustrates only 10,434 are required.

2. Under-estimation of the impacts of development on Ipswich

We want the best for Ipswich with the right policies put 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 consultations responses, 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. We are very disappointed that our previous comments on Table 3-2 have been largely ignored by Hyder in its formal response to our draft SA consultation response (Appendix 3). This Table also fails to use most recent baseline data. In good faith, we also suggested a number of potential improvements to the Objectives and Indicators in Table 3-3, which have also been ignored by Hyder in its formal response to the draft SA consultation (Appendix 3). The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.

In particular the SA fails to fully take account of transport, air quality, economy and waste water issues as follow:-

Transport

We are pleased that the 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 other policies within the Core Strategy and the Garden Suburb SPD." However, 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 clearly unsound and needs to be undertaken before multiple starts can even be contemplated. In order for the CS to be sound the recommendation for updated traffic modelling needs to be implemented in order to demonstrate that the proposed CS is sound before it can be formally adopted. Without updated traffic modelling there is insufficient evidence to demonstrate that the proposed CS is sound.

We also welcome the recent appointment of WSP by Suffolk County Council 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 SA in order for it to be sound. There is no evidence that a sustainable traffic solution can be implemented that will allow the proposed build out of the Northern Fringe. This must be reflected in the SA for it to be sound. We also note the concerns of SCC in the Cabinet's paper² 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." The views of the highway authority clearly need to be taken into account in the SA for it to be sound; currently they are not.

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 DM17³ and the Travel Ipswich Scheme." However, the proposed removal of the requirement in the current CS for sequential development

² Agenda Item 6, SCC Cabinet 24/02/15.

³ 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.

of the IGS to allow multiple starts will make this difficult to implement. 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 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”.

The SA continues to underestimate the current transport issues facing Ipswich that are well known to its residents and widely reported elsewhere. IBC now recognises that there are congestion and capacity issues (paragraph 5.8), which in our opinion must be urgently addressed in order to deliver the CS. Until these issues are resolved businesses will be put off from investing in Ipswich and the jobs target will not be achieved. The SA must better consider these issues and the CS must identify the required transport improvements in the Infrastructure table to be sound. Whilst there has been some welcome success, such as the delivery of the Ipswich Chord, much more needs to be done. The evidence base demonstrating long-standing transport issues includes:

- The continued cross-party lobbying of Government for rail and road improvements to improve journey times into London etc and tackle the increasing levels of congestion affecting major strategic routes including the A11, A12 and A14.
- Paragraph 2.7 of the NALEP draft Strategic Plan, January 2014 states “Improvements to our rail infrastructure are crucial, with East Anglia suffering from a legacy of under-investment compared with other regions. Paragraphs 3.25 and 3.25 reiterate the problems stating “our transport network is ageing, and whilst Government investment in dualling the A11 through Suffolk and Norfolk is welcome – further improvements along our major trunk roads - the A11, A12, A14 and A47 are needed to reduce congestion and enable our sectors to compete nationally and internationally.” Figure 4: Map of transport infrastructure requirements identifies the many improvements required around Ipswich including A14/A12 Seven Hills, A14 J57 Nacton, A14/A12 J55 Copdock. Paragraph 6.37 states that traffic congestion in Ipswich is expected to increase by 15% - 20% by 2032.
- The Delivery Plan for the Suffolk Growth Strategy also recognise that improvements are urgently required for both rail and road infrastructure in its proposed actions 16 and 17.
- The 2014 Cities Outlook report⁴ ranks Ipswich as the 48th most congested city out of 56, showing that congestion is already a major issue that will only get worse with increased housing especially as people will be forced to commute to sites of new employment.
- Paragraph 12.4 of the Ipswich AMR, which states that “chronic peak delays increasing in severity and extending over a longer period both in junctions around the town centre and also near to the developing employment concentrations such as Adastral Park and Ransomes Europark.”
- The warning from Suffolk County Council’s transport policy holder spokesman, Graham Newman, that passenger rail services on the Felixstowe branch have become so unreliable that travellers are no longer using them and that the Felixstowe rail line appears to be facing a serious run-down in passenger services⁵.
- The cut in train services going through Westerfield and Derby Road stations.
- Train rolling stock is largely antiquated and obsolete without wireless access/power sockets etc and trains still dump untreated sewage on the lines and trackside.
- The public’s concerns that the Travel Ipswich works, especially the traffic lights, are slowing down traffic flows, although the system is not yet fully implemented.

The Transport Assessment submitted by CBRE as part of its planning application for the IGS includes an assessment of traffic impacts. Table 11.2, for example shows that journey times in the PM peak on Henley Road South Bound (between Valley Road and Fonnereau Road) are predicted to rise from 3.3minutes to 10.8; Anglesea Road, Berners Street SB (between Henley Road and A1156) from 4.3 to 12.0; Bond Street NB (between Star Lane and A1156) from 2.4 to 7.3; Bond Street NB (between Star Lane and A1156) from

⁴ http://www.centreforcities.org/assets/files/2014/Cities_Outlook_2014.pdf

⁵ http://www.ipswichstar.co.uk/news/felixstowe_where_have_all_our_trains_gone_passengers_lose_faith_in_rail_service_1_3295413

5.9 to 17.0. Taking the table as a whole, there are nine instances where journey times on a particular link have been more than doubled and three where they have been tripled.

The resulting effect of these delays will extend the peak commute times into the warm-up and cool-down periods. However, when looking at the length of these routes, the figures are even more disturbing. For instance, to travel just 100 metres will take:

- 7.37 minutes on route 125
- 5.36 minutes on route 131
- 5.22 minutes on route 132
- 4.46 minutes on route 173
- 3.1 minutes on route 104.

This shows that traffic is virtually stationary. The road network will clearly be unable to handle any form of breakdown, accident, roadworks or emergency. Emergency vehicles will undoubtedly 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 with detrimental health impacts. This is clearly not sustainable. This analysis shows that traffic will have a severe adverse impact that will affect people across the whole of the north of Ipswich that must be properly taken into account in the SA for it to be sound.

We also note that the Traffic Management Officer of Suffolk Constabulary has raised concerns regarding the increased volumes of traffic. 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.⁶ To date we have not seen any evidence of this. The SA must take fully account of the current issues and properly examine whether there is sufficient evidence that effective cycling solutions can be implemented to cope with the increased volumes of traffic.

This CBRE analysis fails take into account traffic arising from developments in neighbouring authorities so the actual impacts will be even worse. It should also be noted that these figures are based on modelling that the Suffolk County Council and its advisors have identified as flawed and actually under-estimate peak flows for several reasons. The SA needs to recognise these severe adverse impacts of the IGS development in its analysis in order to be sound. IBC has not provided sufficient evidence that the CS will not result in severe traffic and air quality impacts and needs to undertake further traffic modelling as stated in the SA to justify that the CS is effective and sound. Until then it cannot be adopted.

Air quality

The SA still appears to use 2010 air quality data as its baseline and continues to fail to acknowledge that air quality is worsening in Ipswich and will potentially require a larger, town-wide AQMA or the widening extension of existing AQMAs. The 2013 Annual Report states that "The results obtained from the existing detailed assessments confirmed the need to consider the declaration of a new town centre wide AQMA." and "The next course of action will be to declare the new AQMA which is expected to be completed in the Summer of 2014."

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." Section 9.3 then states that "The Detailed Assessment required to declare either a larger AQMA to include the areas showing exceedance outside of the existing AQMAs, or to declare more small AQMAs is ongoing and will be concluded within the next three months." This assessment should have been delivered by November 2014 and must be taken into

⁶ 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

account in the SA in order for the assessment to demonstrate that the CS is effective with regard to improving air quality. Clearly this is an ongoing issue that has not yet been addressed. IBC needs to provide evidence that air quality levels will not jeopardise delivery of its CS.

Pedestrians and cyclists will not want to walk/cycle through AQMAs alongside queuing traffic as this will damage their health. Unless this issue is better recognised and addressed in the SA it will undermine the sustainable travel proposals and the CS travel related policies will fail. Ipswich's air quality needs to be assessed in the context of DIRECTIVE 2008/50/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 May 2008 on ambient air quality and cleaner air for Europe. In relation to NO_x the limits are set out in Annex 2.A.2. These legally binding limits need to be taken into account in the SA of the effects of increased traffic from the Northern Fringe in Ipswich. The Results of Nitrogen Dioxide Diffusion Tubes in 2011 show that the annual mean concentrations already exceed EC limits for many sites. The European Commission has launched legal proceedings against Great Britain for failing to reduce "excessive" levels of nitrogen dioxide (NO₂) air pollution from traffic, despite 15 years of warnings and several extensions and postponements granted to government and is proposing to levy financial penalties accordingly. The SA has failed to identify this breach of European law and failed to make recommendations that IBC's CS needs to ensure compliance with this Directive in order for its Transport Strategy to be sustainable.

The SA must also consider the likely detrimental implications of the CBRE Transport Assessment on air quality, for example from stationary traffic outside St Margarets, St Helens and St Matthews primary schools during the morning rush hour when children are walking to school. IBC needs to provide better evidence that the proposed CS will not have a detrimental effect on air quality in order to be sound.

Please see our comments on DM17a and DM17b under Transport, which equally apply to Air Quality.

We also note that there is a lack of recent Air Quality progress reports and the latest Detail Assessment, which should have been delivered by November 2014, in the Local Plan Core Document Library and this need to be added accordingly.

Economy

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. How will we know if the jobs target has been met if it is not clear what it actually relates to. The CS needs to clearly specify the area the jobs target applies to in order to be sound. The SA (paragraph 4.1.1) appears to assume that this target applies to Ipswich Borough and takes no account of travel to work to other employment sites outside of the Borough. This is unsound and needs to be reappraised. A jobs target specifically for Ipswich Borough is required to avoid ambiguity and to help focus delivery. IBC fails to provide sufficient evidence that the jobs target is viable for Ipswich Borough and needs to do so to demonstrate that the CS is sound.

We have previously raised concerns with the SA on employment issues and are pleased that IBC has taken our advice and better aligned its target employment sectors with NALEP and the Suffolk Growth Strategy. However a study⁷ 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 data⁸ shows that 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 SA needs to take account of the outputs from this study in its assessment in order to be sound.

The key driver for jobs growth in Ipswich is linked to local population growth, rather than national or international products and 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

⁷ Viability Testing for the Ipswich Development Plan, Peter Brett Associates December 2014

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

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. The SA needs to assess the implications of this in order to be sound.

Regarding retail development in Ipswich (Policy CS14), 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 SA of the CS has failed to acknowledge these severe obstacles to jobs growth and failed to put forward proposals on how they may be overcome. We want to see the SA recommending the inclusion of further measures in the CS that will help improve the Retail offering in Ipswich and deliver new jobs and help make it sound.

IBC has recently purchased the Ipswich Sugar Beet site which is outside the Borough, presumably as part of its economic development strategy and in relation to its 12,500 jobs target. The SA needs to assess the impacts of this as it is non-compliant with Policy CS2 and would appear to breach CS13 where IBC states that its “focus will be on the delivery of jobs within the Borough” and as such the proposed SA is unsound as it fails to take account of the Council’s current approach. The CS needs to refer to IBC’s land acquisition strategy and the SA needs to assess how it might impact on the CS. We are unclear on the cost of this land acquisition but we suspect it will be over £20m when taking into account capitalisation of interest charges and the provision of basic infrastructure, which is clearly material. It is reasonable to assume that IBC will therefore be focusing its efforts on delivering jobs on this site to the detriment of those areas such as the town centre identified in the CS. We believe that under the CS this level of funding should have gone to help deliver new jobs in and around the town centre such as new office clusters between the town centre and the railway station, which leads us to question the soundness of the proposed jobs target. IBC needs to provide evidence of how its purchase and proposed development of this site fits with the proposed CS in order that the CS can be found to be sound.

The SA needs to assess the evidence that the acquisition of this site was with the prior agreement of Babergh Council and confirm that its plans for the site have been agreed with Babergh Council in accordance with its Core Strategy, otherwise IBC will have failed its duty to cooperate.

Waste water

The SA still fails to take sufficient account of the waste water issues arising from the proposed expansion of Ipswich. Paragraph 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 waste water 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, 2009⁹) concludes that:

- Existing sewage treatment capacity for residential and commercial development reaches capacity in 2014/15.
- Significant infrastructure upgrade is required for waste water 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 AWS 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

⁹ 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.

STW. AWS 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. The current situation clearly needs to be clarified and examined as part of this SA. Any additional sewage infrastructure requirements to meet the proposed homes and jobs expansion in the CS must be identified and included in the Infrastructure table for the CS to be sound.

Hyder's response to our comments simply states that it has referred to Anglian Water's Water Resources Management Plan 2015 (published 2014) in the PPP review of the SA Report but fails to assess the potential implication of this and to Anglian Water's "ES3 Ipswich water reuse" project. This plans "for the discharge of treated effluent from Ipswich to the tidal River Gipping to supplement river flows and permit increased abstraction. The effluent would be treated to an extremely high (near potable) standard using reverse osmosis before transfer via a new pipeline. A new pipeline and pumping station would also be required to convey the water to the water treatment works which would require additional treatment capacity." This vital piece of infrastructure, which will take significant time and funding to deliver, needs to be specified in the CS Infrastructure Table, rather than using the catch-all heading of "Utilities", as the CS will obviously fail without it. It is not clear how the development proposed in the CS is taken into account by Anglian Water, most notably with respect to the timing of the IGC development. IBC needs to provide sufficient evidence that the water/waste water infrastructure can be delivered in a timely manner that allows the CS to be shown to be effective.

Section 3.2.4

The SA continues to underestimate the impact of Objective ER3, which is incompatible with:

- ET1: To improve air quality
- ET2: To conserve soil resources and quality
- ET3: To reduce waste
- ET4: To reduce the effects of traffic upon the environment
- ET6: To limit and adapt to climate change
- ET7: To protect and enhance the quality of water features and resources and reduce the risk of flooding
- ET8: To conserve and enhance biodiversity and geodiversity

Whilst the SA process identifies mitigation measures to help to address these, it is not realistic for the assessment to rank these just as uncertainties when there are obviously going to be negative impacts most notably due to large scale building on the Northern Fringe. Indeed Section 4.3.1 of the SA states "the increase in development is likely to increase the amount of waste produced and energy consumed. Carbon emissions are expected to increase" and "The effects of the spatial strategy on air quality and traffic were appraised as overall negative". Section 3.2.4 needs to recognise this and the assessment revised and reassessed accordingly in order to judge whether the CS is sound.

Looking at ET1 as an example, the physical area covered by AQMAs in Ipswich is increasing thereby demonstrating that new developments are already having adverse impacts. The development of the Northern Fringe in particular will have adverse impacts on the AQMAs around the town centre and Norwich Rd as residents commute to new centres of employment. This needs to be recognised accordingly. People are less likely to cycle and walk in AQMAs due to the level of congestion and the increased exposure to pollutants, thereby reducing the potential of sustainable travel. Likewise cycling will be less attractive on busier roads and is already viewed as unsafe in some areas by both the Police and the County Council (see comment in relation to St Helen's school).

Section 3.2.4 We have previously commented that "There will obviously be an increase of traffic during the construction / operation of new residential development associated with an increase of inhabitants and their future transport requirements, therefore this will obviously affect local air quality and climate change" and that this paragraph is highly misleading and needs to be amended accordingly. Hyder's formal response to this comment (Appendix C) was "It is agreed that there is likely to be an increase in traffic and the paragraph should be reworded in this respect". However, our comment has been ignored and this paragraph remains unchanged. The SA needs to be reviewed to ensure its accuracy and corrected where required.

Timely delivery of the Northern Fringe Country Park

Paragraph 8.52 of the CS states that “The Stour and Orwell Estuary Special Protection Area is protected under the Habitats Directive due its importance for bird populations. The 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 for this was the delivery of the new Country Park in the Ipswich Northern Fringe in 2021 (Table 8 in the current Core Strategy).

Unfortunately the SA (and the Appropriate Assessment) completely ignore the major change regarding the delivery of the Country Park in the Northern Fringe contained in the new Table 8b that 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.” Therefore, say, if only 499 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 any later than 2021 or not at all this will adversely impact on the integrity of a European designated site. This is clearly non-compliant with Paragraph 2.8 of the CS as IBC has not provided evidence that this is the case. The CS needs to guarantee delivery of the Country Park in a timely manner either by specifying a firm delivery date or the delivery is 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.

We also note that the Habitat Regulation Assessment (HRA) screening report for the CBRE 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. Policy CS10 and Infrastructure Table 8b) need to be revised to remove the risk of this unintended consequence.

Both the Appropriate Assessment and the SA need to be revised to take account of this proposed change to the CS. The CS is currently unsound and needs to adopt the recommendation made in the HRA Screening report for CBRE as stated above or at the start of the IGS development. Currently there are severe potential negative effects of Policy CS10 on CS4 and CS16 until the delivery of the Country Park takes place which need to be recognised in the SA

Potential alternative strategies

In our view, the original SA was flawed because it did not look at alternatives to the Policies other than “do nothing” for example through cooperating more closely with other local authorities and locating new homes nearer to new sites of employment which would be more sustainable than building on the Northern Fringe away from major sites of new employment.

This could also include the change of use of designated employment land to mixed use, for instance the Sproughton Sugar Beet site which has lain empty for over a decade and has recently been acquired by IBC. This would enable new homes to be located near new jobs, which is clearly more sustainable. In relation to Section 4.3 Core Strategy Policies, we therefore do not believe it is appropriate to assess each policy against a 'do nothing' option in the 2009 Sustainability Appraisal.

The SA fails to recognise that it is unsound to allocate the entire Ipswich Northern Fringe when its delivery may not be viable over the timescales of the plan. To lower the dependency of the CS on the IGS, the SA should be recommending the inclusion of 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 disappointed that IBC has ditched its previous employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public, in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed. A better balance between new jobs and new homes is required. The town cannot support a growing population without commensurate change in the level of accessible jobs provision. This needs to be considered as an alternative. With the acquisition of the Sugar Beet site, it now appears that IBC is changing its CS yet again to one of delivering new jobs outside the Borough away from the previous priority sites identified in both the existing CS and the proposed CS. This is clearly an alternative strategy as the Council is already pursuing it and needs to be considered accordingly. We also note that in the Ipswich Angle (February 2015) Councillor Ellesmere states 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". It now appears that building new homes for IBC on this site is a potential option that should also be assessed by the SA.

We note that the NPPF¹⁰ requires housing needs to be met within the Borough boundary unless 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. The SA needs to consider this aspect of the NPPF accordingly.

The viability of the allocation of the Westgate site for Retail has been questioned by Ipswich Central and the alternative options proposed by Ipswich Central for Retail sites need to be considered in the SA of the Site Allocations accordingly.

Taking full account of cumulative effects

The SEA Directive requires that the assessment includes identification of cumulative and synergistic effects including those produced by other authorities such as neighbouring local authorities. The SA does not appear to take full account of the cumulative effect of Core Strategies of neighbouring authorities regarding housing, employment and especially transport/traffic with regards to increased air pollution and traffic congestion. These aspects need to be fully assessed in order for the SA to be sound.

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. Unfortunately there are no published joint topic papers on housing growth, jobs growth and strategic infrastructure including addressing well known 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. The SA needs to take account of the outputs from the IPA Board when available in order to be sound.

Other comments

¹⁰ Paragraph 179, National Planning Policy Framework 27th March 2012

Maintaining a PDL target The removal of a PDL target from Policy CS9 needs to be better considered in the SA. We believe that there will be major negative impacts on the redevelopment of brownfield sites, particularly those in and around the town centre which continues to deteriorate. Consideration of an option for keeping a target at a reduced level should be included. This could be decreased over time.

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)". This has recently been reinforced by a Ministerial Statement¹¹. 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 has recently recognised this general trend across the country and now plan to offer incentives for brownfield development.

4.3.1 Spatial Strategy (CS2) We note the comment that "it promotes sustainable growth, development and regeneration across the borough to meet local needs but also places the highest densities in central areas (within IP-One and local centres) which are most accessible and most densely populated. It directs primary retail development towards the town centre and employment uses to existing, established employment areas, also providing a strategic employment site at Futura Park.". CS2 is inconsistent with IBC's purchase of the Sugar Beet site and this needs to be revised and reassessed accordingly

We note the comments that "the increase in development is likely to increase the amount of waste produced and energy consumed. Carbon emissions are expected to increase" and "The effects of the spatial strategy on air quality and traffic were appraised as overall negative". These need to be accurately reflected in the assessment of Section 3.2.4.

We also note that SA does not assess the effects of around 4,000 new dwellings in neighbouring authorities in the long-term. In our view these are likely to add to the negative effects mentioned above and need to be assessed as such. It is not clear how the need for these new dwellings is reflected in the Core Strategies of neighbouring authorities and how the sustainability implications have been assessed. The SA must take this into account in order to be sound.

Please refer to our earlier comments on Traffic and Air quality issues.

4.3.2 Development of the Strategy (CS1, CS3, CS4, CS5 and CS6) We note that paragraph 8.70 of the CS 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." Despite repeated requests, these evidence based documents 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 DPD process. This evidence needs to be made available to the general public as part of the CS examination in order for it to be legally compliant.

As an example an inspection of the jobs growth forecasts from the Babergh, Mid Suffolk and Suffolk Coastal Core Strategies and the IBC CS Focused Review show that the combined CS forecast jobs growth is 26% higher than the total forecast by the EEFM January 2015 data across these authorities, There is a major risk that the individual jobs targets of each local authority are unrealistic when compared to the total potential across the four authorities. 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 SA states that "It is assumed that this will benefit the overall delivery of sustainable development in relation to a number of sustainability objectives." Evidence needs to be provided that this is the case and that the core strategies of neighbouring authorities take into account the need to deliver 4,000 extra homes and new jobs in addition to their own targets in order for Ipswich Borough Council to meet its own targets

¹¹ http://www.parliament.uk/documents/commons-vote-office/March_2014/6th-March/1.%20DCLG%20Local%20Planning%20.pdf

and that the sustainability impacts of this, especially in relation to transport, have been fully assessed in order for the SA to be sound. It also begs the question why Ipswich's CS contains targets that require both new homes and new jobs to be created in neighbouring authorities.

4.3.3 Live (CS7, CS8, CS9, CS10, CS11 and CS12) Whilst "Policy CS9 encourages development to be on previously developed land first" we believe that this needs to be strengthened through the re-introduction of a specific target as in the current CS, which strengthens the focus on delivery.

Please see our comments in relation to the Country Park and the lack of an effective delivery mechanism for the Country Park that breaches the Habitat Directive.

Please see our comments on **Transport** in relation to the CBRE traffic analysis.

4.3.4 Work (CS13 and CS14) The SA states that "Policies CS13 and CS14 seek to provide significant employment (including retail) opportunities (i.e. 12,500 new jobs) within the Borough". This is incorrect as the target does not appear to relate to the Borough but to the Ipswich Policy Area. The SA needs to be reappraised accordingly in order to be sound.

Ipswich Central disagrees that the proposed Westgate Development is viable for the Town Centre and that the land is better suited to Mixed use development. We agree and the SA needs to be reassessed accordingly. Please see our earlier comments in relation to the Viability Report for new employment sites. The implications of this must be assessed by the SA for it to be sound.

The CS omits any reference to IBC's apparent development strategy to purchase land outside of the Borough to underpin its economic objectives i.e. the Ipswich Sugar Beet site, which appears to be in breach of Policy CS2 and CS13. The SA therefore has been unable to assess this approach and needs to do so in order to be sound.

4.3.6 Play (CS16) Please see our comments in relation to the Country Park and the lack of an effective delivery mechanism for the Country Park that breaches the Habitat Directive.

4.3.7 Infrastructure (CS17, CS18, CS19 and CS20) Please see our comments in relation to Waste Water and the Country Park.

4.4.2 Urban Design Policies and Protecting Our Assets (DM5, DM6, DM8, DM9 and DM10) In order to be sustainable Policy DM10 needs to reference the Hedgerow Regulations 1997 and the CS needs to state that "important hedgerows" will be protected from being removed (uprooted or destroyed).

Please see our comments in relation to the Country Park and the lack of an effective delivery mechanism for the Country Park that breaches the Habitat Directive.

4.4.4 Transport and Access (DM17 and DM18) Please see our earlier comments under Transport.

4.4.6 Employment Land (DM25) In order to be sound the SA needs to take into account the cumulative impacts of traffic within Ipswich Borough from developments in neighbouring authorities. It also needs to recognise that the Employment target does not appear to be for jobs within Ipswich Borough but in the wider Ipswich Policy Area. Currently it under-estimates the effects of commuter traffic to sites of new employment. As recommended in the SA, the traffic modelling needs to be updated. Otherwise there is insufficient evidence that the CS is sound.

4.4.7 Amenity, Open Space, Sport and Recreation and Community Facilities (DM26, DM27, DM28, DM29 and DM32) Please see our comments in relation to the Country Park and the lack of an effective delivery mechanism for the Country Park that breaches the Habitat Directive.

4.4.8 The Natural Environment (DM31, DM33 and DM34) The SA incorrectly states the CS makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure

the timely delivery of the Northern Fringe Country Park that would be required to mitigate the effects of new development and is in breach of CS 2.8. Please see our comments in relation to the Country Park and the lack of an effective delivery mechanism for the Country Park that breaches the Habitat Directive.

Brian Samuel & Rod Brooks

Submitted on behalf of the Northern Fringe Protection Group¹²

03/03/15

Issue 1

¹² The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its 183 members and 140 other residents who have authorised the NFPG to represent them totalling 323 people. A list can be supplied on request.