



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Comments on the Ipswich Borough Council Draft Ipswich Garden Suburb Supplementary Planning Document (SPD)

– 13th January to 10th March 2014

Summary Of Key Issues

The Northern Fringe Protection Group does not support the development of the Ipswich Northern Fringe, preferring the regeneration of brownfield sites closer to the sites of new employment across the Ipswich Policy Area to meet housing needs. However, we have made these arguments in relation to the Focussed Review of the Ipswich Core Strategy since this relates to policy not the Ipswich Garden Suburb SPD.

If the development is to go ahead, then we wish to see this done in a comprehensive planned way both in terms of design and implementation, bringing as much benefit as possible to existing communities whilst minimising the negative impacts.

We are supportive of the role of the SPD in providing design guidance and masterplanning including infrastructure provision.

There is much to like about the Ipswich Garden Suburb guiding principles especially the green and open spaces including the country park, tree lined streets and retention of established trees and hedgerows. We would like to see lower housing densities and larger gardens more in keeping with the adjoining neighbourhoods but appreciate that greenfield space is a precious resource and a balance must be struck.

Issue 1 Wrong Location For Employment

No matter how attractive the development there is no getting round the fact that the site is poorly connected to principle sites of employment growth as identified by both the 2013 Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan. As such the sustainability of the entire development is questionable. The only principle employment growth site identified within the Ipswich boundary is the Futura Park/Ransomes Europark expansion. The next two nearest sites are the Former Sugar Beet Factory and Adastral Park. None of these are within easy reach of the proposed Northern Fringe housing development by public/sustainable transport. Since sufficient jobs growth is unfortunately not forecast in the Town centre then commuting by car would seem inevitable, with traffic congestion becoming even worse than it is now.

An inspection of the jobs growth forecasts from the Babergh and Mid Suffolk Core Strategies shows much higher jobs growth forecasts than the latest predictions from the East of England Forecasting Model (3.8 times higher for Babergh and 2.5 times higher for Mid-Suffolk!). According to Babergh, part of the rationale behind this major difference in forecast jobs growth is that some of the economic growth needed for Ipswich Borough (which is tightly constrained by its boundaries) needs to fall within its larger neighbouring districts. That is, there is an expectation from some

neighbouring Local Authorities that more Ipswich residents will commute to employment sites outside of Ipswich. This needs to be reflected in the SPD and taken into account in transport modeling.

The SPD needs to be stronger in recognising that direct bus routes from the Northern Fringe to sites of new employment will be required. The SPD also needs to be stronger in recognising the need to improve the Ipswich – Felixstowe train service which has been reduced in frequency and substantially deteriorated in terms of reliability.

Issue 2 Traffic Congestion

Our members and other members of the public have consistently raised concerns with IBC and Suffolk County Council over the impact of the proposed Northern Fringe development on traffic congestion, rat runs and air quality. Proposed frequent bus services and good cycle routes into Ipswich town centre, although commendable, will not solve this problem! We have major concerns over the proposed traffic scheme especially the replacement of the Valley Road/Westerfield Road and Valley Road/Tuddenham Road roundabouts with traffic lights. These roundabouts currently work well and the 'jury is out' on the Travel Ipswich Urban Traffic Management and Control (UTMC) System, which has received much unfavourable press. A full traffic impact assessment needs to be made of the Ipswich UTMC System before considering installing yet more traffic lights in the north of Ipswich. We note in section 6.4.1 that a full transport assessment will be required at the Outline Planning Stage and trust this key issue will not be 'brushed under the carpet'. This needs to include a full assessment of the potential impact on air quality and the existing town centre AQMAs which traffic from the Northern Fringe is likely to flow through. This requirement should be specifically stated in the SPD.

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

Issue 3 Multi-site Development

It is IBC's intention to sanction multiple starts across the whole of the Northern Fringe from the outset. We object to this, not only because of the negative impact on the regeneration of brownfield sites, but also the risks associated with this approach.

Multi-site development of the entire Northern Fringe from the outset will work against the CS spatial strategy set out in Policy CS2 by undermining urban regeneration efforts. This will detrimentally impact on the building of new homes on brownfield sites as it is cheaper and easier to build on greenfield land.

We note that the Northern Fringe SPD proposes controlling the risks of multiple starts as outlined in its "Approach to development sequencing" and "Implementation, Delivery and Monitoring" in Chapter 7. This is clearly the intention of IBC so we urge that these requirements, especially the proposed development sequencing and the requirements in Paragraph 7.31 are also included in the CS for completeness and clarity. The SPD cannot set policy and without the inclusion in the CS there

is a risk that this might not happen (see our response to the CS review). The SA needs to recognise the risk and recommend that these proposals be incorporated in the CS to ensure that they are followed. The development sequencing of the Northern Fringe needs to be reviewed once the housing needs and target figures have been reassessed in the Core Strategy using the most recent data.

We also advocate that restrictions are placed on the number of sites operated by any one developer at any one time. We suggest that this be limited to one main operational site per developer at any one time although these could be staggered as one site nears the end of development. This would clearly result in a more sustainable approach to the development of the Northern Fringe by better managing the issues associated with multi-site development. We support the establishment of a Delivery Board as outlined in section 7.32 especially the inclusion of community representatives.

Issue 4 Drainage and Flooding

Drainage and flooding are key concerns particularly for Westerfield residents. In the UK we are experiencing extreme weather more regularly. For example the UK Meteorological Office have reported that up to the end of 2012 4 of the 5 wettest years on record have occurred since 2000! 2014 has started off particularly badly. This brings into question whether the statistical models are adequately mirroring our apparently changing weather patterns. Whilst we appreciate that IBC have little option but to use the statistical models provided by government bodies, what is clear is that developments need to be made more resilient to flooding since the price of failure is high. One way this could be achieved is to provide additional error margins or to undertake a sensitivity analysis by varying some of the underlying assumptions. We welcome the Ministerial Statement¹ made by Nick Boles on 6th March 2014 that the Government plans to issue robust guidance on flood risk as part of a revision of the NPPF Planning Guidance.

The Sustainable Urban Drainage (SUDs) proposals referred to in sections 4.46 – 4.56 need careful assessment, sensitivity analysis and planning, particularly as the Northern Fringe is built on clay and prone to flooding in some locations. SUDs may not just affect the immediate area but through draining into watercourses and rivers contribute to the flood risks elsewhere e.g. River Gipping.

Although we are not convinced that the analysis and recommendations of the Ipswich Borough Drainage Engineer provide a resilient enough solution and would argue for more error margin to be included or sensitivity modelling to be undertaken, nevertheless, we would wish to see a solution that aligns with the judgement of the professionals independent of the developers. We note that the Ipswich Garden Suburb SUDs proposals do not appear to provide a solution that fully fits with the recommendations of the Ipswich Borough Drainage Engineer. To ensure sustainability all revisions to the proposed SUDs scheme made by the Environment Agency and SCC/IBC Drainage Engineers must be incorporated into the design.

Although section 4.53 bullet point 2 makes a recommendation of an approximate area that may be required for SUDs, in view of the importance of this matter we would like to see a separate budget provision made for SUDs in the table shown in 3.11, rather than it being hidden in other budgets.

Issue 5 Infrastructure Table 1-4

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

We support the inclusion of these tables in the SPD and similarly Table 8b in the CS. Although we have a number of concerns we believe these can easily be addressed.

- Table 1 Vehicular rail crossing and Fonnereau Way cycle / pedestrian bridge across rail line. There is a risk that development of Henley Gate reaches 299 homes then stops for several years, whilst other developments continue unabated resulting in unconnected developments. This needs to be guarded against especially in relation to access to the high school and district centre from Henley Gate.
- Table 1 Traffic management scheme for Westerfield village, The Crofts and other locations. This needs to specifically reference Whitton and The Dales as well.
- Table 1 The provision of the country park and associated facilities e.g. visitor centre/parking are rightly included in the SPD but also need to be included in Table 8b of the CS. We assume this is an oversight.
- Table 1 Enhancements to school playing fields and other outdoor recreation facilities for community use. This requirement should include the agreement of an acceptable access plan to enable the community to use facilities during both school and non-school hours. This is especially important given the potential to be free schools/academies.
- Table 1 We are concerned that major infrastructure works will be required to allow sewage treatment from the Northern Fringe development at Cliff Quay STW and details should be included in this table - see Issue 6 below
- Tables 2, 3 & 4 Travel Plan development, implementation & monitoring. There should be a requirement for Travel Plans to include the commute from the Northern Fringe development to the sites of new jobs in the Ipswich Policy Area as this will be the major travel pattern of residents at peak times.
- Tables 2, 3 & 4 2FE (form of entry) primary school & nursery. There is a risk that development stops at 399 homes on the Southern development or 199 homes on either of the Northern or Eastern developments for several years without the provision of a primary school. How would this be addressed, as existing primary schools would not be able to accommodate the increase in schoolchildren? In order to manage this risk, we believe that there should also be a fallback requirement for a primary school on the Northern Fringe, once a minimum number of houses across all three neighbourhoods has been reached.
- Table 1 Likewise there is a similar risk for the 1,200 space secondary school (including sixth form facility) with development stopping at 499 homes for several years. How would this be addressed as school places are required for the Northern Fringe development and as a result of the additional two form entries at St Margarets and Rushmere primary schools?
- Tables 1-4 By risking uncontrolled multiple starts across the Northern Fringe, theoretically 499 homes could be built without any new schools, local centre infrastructure framework, vehicular and Fonnereau Way pedestrian rail crossings or a country park. Whilst we know that this is not IBC's intention, this major loophole needs to be guarded against and closed through amendments to the CS.

Issue 6 Sewage Infrastructure

We are concerned that major infrastructure works will be required to allow sewage treatment from the Northern Fringe development at Cliff Quay Treatment Works and the worrying lack of information from Anglian Water on this issue. Anglian Water stated at the Community Steering Panel meeting of 12th February 2013 "it was currently liaising with developers to reach solutions for water and drainage supply. Notably, dealing with foul drainage might either involve the construction of a new sewer from the site to Cliff Quay or alternatively to pipe sewage to and upgraded treatment works at Donkey Lane, Tuddenham. End of March [2013] was anticipated for the deadline for the current work-stream." At the time of writing whilst we understand that proposals have been

made for fresh water supply, Anglian Water has still not produced a foul water plan for the Northern Fringe, which is extremely worrying.

The Council needs to obtain assurances and greater detail from Anglian Water that the delivery of sewage infrastructure will be timely and affordable. Details of Anglian Water's preferred solution should be included in the Chapter 7 of the SPD, including Table 1 as this could create major disruption across Ipswich and jeopardise the timing, size and cost-effectiveness of the development.

Issue 7 Omission of Hydrology and Topography Data

The SPD omits any information on hydrology or topography. This is a major oversight that needs to be addressed before the SPD can be agreed. Currently it is not clear that the SPD optimises the topography of the site, for example in relation to flood prevention/SUDs.

Issue 8 Design Statements

We would like to see a greater commitment for the eventual detailed design to be of the highest award-winning quality that will set the Northern Fringe as the flagship standard for all similar developments to aim for.

Issue 9 Rear Gardens

Sections 5.44 – 5.46 specify the minimum rear garden space for properties, which we feel cram houses too close together for a garden suburb. We would like to see larger dimensions than the minimum back garden length of 9m and area of 75 sq m for a 3-bed property and 50 sq m for a 2-bed property. We suggest a minimum back garden length of 12m and area of 100 sq m for a 3-bed property and 70 sq m for a 2-bed property.

Issue 10 Car Parking

We are pleased to see in section 5.45 that the minimum dimensions for back gardens do not include any rear parking spaces.

We note that there are imaginative details of potential Car parking and Garage layouts on pages 112 to 115. However the House Type D (page 110) shows a dwelling at the top of the page where car parking occupies most of the rear garden space contrary to 5.45. This detail needs amending. The Parking details generally show minimal parking spaces e.g. a 3 Bedroom / 5 Person House with 2 spaces or 1 garage plus 1 space. For modern families where young adults stay longer in the family homes this is likely to prove inadequate, especially as many residents will need to use their cars to commute to places of employment. To avoid undesirable parking on grass verges etc. we would like to see a recommendation for a minimum car parking space per dwelling specification and a minimum width for garages to fit today's relatively larger vehicles. This will result in a more sustainable car parking solution.

Issue 11 Sports Pitch Provision

Section 3.16 of the SPD recognises a provision of 12ha is required to comply with the Core Strategy Appendix 6 but that the formal open space, which includes sports pitches, amounts to 5.5ha i.e. a deficit of at least 6.5ha. Appendix 6 of the Core Strategy specifies 1.53ha outdoor sports space provision per 1000 people. There is already an under provision in Ipswich particularly in the North and Central Areas. Also we note that the population of Ipswich was shown in the 2011 Census to be

much higher than expected and the latest EEFM 2013 Ipswich population forecasts are significantly higher than the EEFM 2012 data used in the Cores Strategy Focussed Review.

We request that the 12ha requirement is reassessed in the light of such evidence and suspect it to be an underestimate of that needed to meet IBC's required standards for the Central/North areas. The Northern Fringe is the last major area of greenspace within the Borough that could be used to address the deficit in publicly available outdoor sports provision and IBC should give this appropriate consideration rather than make the situation worse.

The SPD refers to 'additional provision should be made at the secondary and primary schools where all-weather pitches and shared community use is sought'. This may not be so easy to achieve since free schools/academies are free to make their own decisions and that schools normally require access to such facilities both in and outside of schools hours. Any such shared facilities should include the agreement of an acceptable access plan agreed with the local community to enable community use of facilities during both school and non-school hours. Any sports provision on shared sites that is not regularly accessible to the general public during school time needs to be topped up by additional facilities on a pro-rata basis.

There should be an additional requirement included in the SPD for all sports pitches to be provided on well-drained flat land.

Issue 12 Clarification Required of Long Term Management and Maintenance

It is not clear what the proposed annual service charge levied upon residents and business occupiers is intended to cover. We do not believe that it appropriate for this to include the maintenance of SuDs and swales, which should be funded by the SuDs Approving Body (SAB) i.e. Suffolk County Council. Likewise we feel it unfair that the Country Park maintenance costs should only fall on the shoulders of the Ipswich Garden Suburb residents and businesses since the Park will benefit all Ipswich residents and others living in neighbouring Local Authorities, such as Mid-Suffolk. In our opinion Ipswich Borough Council should fund the Country Park as is currently the case for other Ipswich Parks and similar assets.

We would also expect that general maintenance of roadside grass verges, trees etc should be funded through council tax, as is the case for previous developments. To expect Ipswich Garden Suburb residents to pay an additional maintenance charge for these assets, whilst paying council tax that covers maintenance charge for these type of assets used by other residents seems unfair and discriminatory. However, we accept that a surcharge to cover the maintenance of additional assets not typically enjoyed by other residents elsewhere in Ipswich may be appropriate.

Additional Comments

Page 4 Forward We are disappointed that the Foreword is misleading since, although it accurately expresses the position on expected land Northern Fringe land allocations and developments as contained in the adopted Core Strategy, this is not the Council's position expressed in the Focussed Review of the Core Strategy and elsewhere in the SPD. Specifically the Forward states "The Council's Core Strategy, adopted in 2011, allocates land between Henley Road and Westerfield Road and south of the railway for up to 1,000 dwellings prior to 2021 and defines the wider Northern Fringe area as the main source of supply of housing land in Ipswich after 2021. The current review of the Core Strategy will determine the precise extent of further development within this wider area beyond 2021 and make specific allocations for an appropriate mix of housing and supporting infrastructure." This gives the impression that development will not take place in other locations

until after 2021, which is not the Council's intention as explained in paragraph 1.10. Namely the Focused Review of the Core Strategy proposes the entire Northern Fringe to be allocated with multi-site development prior to 2021 as indicated in Chapter 7 of the SPD.

Page 20 We object to the deletion of the following statement from IBC's Vision Statement & Core Objectives "*.... the retention of existing on site vegetation- the retention of existing trees and hedgerows in the interest of biodiversity and in order to maintain and improve the canopy cover, which is a defining characteristic of the adjacent St Margaret's Ward.*". This goes against both sustainability principles and the garden suburb concept. IBC needs to reinsert this accordingly otherwise the public will have little faith in IBC's green vision.

Rod Brooks & Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group²

7th March 2014

Issue 1

² 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.