



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Northern Fringe Protection Group Response To The Consultation On The Interim Strategic Environmental Assessment And Sustainability Appraisal Focused Review Of The 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. 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. The CS and its SA must therefore be based on the best data available, which is not the case as it fails to utilise the most recent DCLG or EEFM 2013 forecasts. Both the CS and this SA are therefore unsound.

The SA must also be revised to take account of new Governmental guidance on the National Planning Policy Framework (NPPF) that has been issued following the Ministerial Statement¹ made by Nick Boles on 6th March 2014. Changes include:

- Issuing robust guidance on flood risk.
- Making clear that local plans can pass the test of soundness where authorities have not been able to identify land growth in years 11-15.
- Making clear windfalls can be counted over the whole local plan period.
- Explaining how student housing, housing for older people and the reuse of empty homes can be included when assessing housing need.
- Ensuring that infrastructure is provided to support new development, and noting how infrastructure constraints should be considered when assessing suitable sites.
- Stressing the importance of bringing brownfield land into use.
- Clarifying when councils can consider refusing permission on the grounds of prematurity in relation to draft plans.

These amendments are consistent with several of the concerns we have expressed in our responses.

Sections 2.3.9 and 2.3.12 fail to identify from the 2013 Suffolk Growth Strategy (sections 2.26, 4.2, 4.4 & 4.5 refer) the need to ‘transform skills from a growth barrier to a growth stimulus’ and ‘Boost educational attainment, aspiration and employability’

Table 2-2 There are serious flaws and omissions in this summary of key sustainability issues and opportunities that need to be corrected for the SA to be sound especially in relation to the use of obsolete data.

Education and Qualifications This needs to better represent the low education standards in Ipswich by using the latest data in the Ipswich AMR (e.g. KS2 4.6% below national average and KS 12.5% below) and from the Ipswich factsheets from the Cities Outlook study which show that Ipswich has low education standards (55 out of 60 for GCSEs & 60/64 for high level qualifications). The performance of the education authority and its failure to help address these issues continues to be criticised by Ofsted. As currently drafted this provides a false impression and is clearly misleading. Why has Hyder chosen to underplay the poor educational standards and ignore both the AMR data and the views of Ofsted?

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

Human Health This underplays the health issues in Ipswich and should use latest AMR data e.g. low levels of regular physical exercise (9.6% adults and 50% pupils years 1-13 compared to Colchester 14.6% and 74.5% respectively). More worrying is that 14.5% of people are registered with their GP as having depression compared to 4.5% nationally. New homes will only help the health of new residents. Can Hyder explain how new homes will improve the health of existing residents in their current homes in the Borough and make recommendations on how to do this for example recommending the regeneration of existing homes to achieve the Decent Homes standard?

Water This needs to consider waste water as well, for instance measures to reduce the odours of Cliff Quay sewage treatment works which affect nearby residents and make adjacent land unattractive to developers. 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, 2009²) 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 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 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 must be identified and included in the Infrastructure table.

Please explain why Hyder has ignored these concerns in its SA and how it plans to address them? We note, as of 12 February 2014, that there is still no foul water report for the Northern Fringe development, which could be a major barrier to its development and hence IBC's CS. This also needs to be raised as an issue.

Air Quality Hyder continues to refuse to acknowledge that air quality is worsening in Ipswich requiring new AQMAs and that residents will want and/or need to drive through the current and proposed AQMAs. Pedestrians and cyclists will not want to walk/cycle through AQMAs alongside queuing traffic as this will damage their health.

Why does Hyder continue to ignore the worsening air quality in Ipswich whilst expecting residents to expose themselves to increasing pollution levels? In order to be sustainable air quality must be improving before encouraging more people to walk and cycle through the town centre.

Why is Hyder not recommending that identified strategies must then be implemented?

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 NOx the limits are set out in Annex 2.A.2. Hyder needs to take these legally binding

² 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.

limits into account in its 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 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. People will not want to walk or cycle through areas of air pollution which will undermine the Council's sustainable travel proposals. Why has Hyder 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?

We note that the 2013 Progress Report is not yet available but should be ready within the next two months. The boundary review for the new AQMAs should also be available at the same time. It is imperative that the CS and SA take account of these reports in relation to compliance with this Directive. Hyder should be making this recommendation accordingly. If not it should explain its reasons for not doing so.

Transport Hyder continues to show a major lack of understanding of the transport issues facing Ipswich in this summary. Please explain why Hyder continues to claim that the Borough is well connected by transport infrastructure and public transport links and ignore the evidence base, for example:

- 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 "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 report³ which ranks Ipswich as the 48th most congested city out of 56, showing that congestion is already a major issue, which 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 services⁴.
- 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.

Why does Hyder ignore all these issues?

Economy This summary uses out of date information and needs to include specific data, for example 16% people in Ipswich are on benefits compared to 11.6% in Suffolk. Average pay is 6.4% lower than Suffolk

³ http://www.centreforcities.org/assets/files/2014/Cities_Outlook_2014.pdf

⁴ http://www.ipswichstar.co.uk/news/felixstowe_where_have_all_our_trains_gone_passengers_lose_faith_in_rail_service_1_3295413

and 15% lower than East of England and has recently decreased whilst it has increased in Babergh, Mid Suffolk and Suffolk Coast (Ipswich SHMA). Why does Hyder not use the most recent Ipswich AMR data? The key issue is attracting high quality, well-paid jobs to Ipswich rather than the current low paid jobs resulting in increasing numbers of people on benefits, which is clearly not sustainable. NOMIS Labour Market Statistics for the year October 2012 – September 2013 show for Standard Occupation Classification Major Groups 1-3 Ipswich has 35.8% compared with the average of 44.1% for GB. Why has Hyder ignored this key issue?

Another key issue is to get the long term unemployed back to work. Why has this opportunity not been mentioned by Hyder?

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 note and support the aspiration of IBC to attract A class office development in the corridor from Ipswich Station to the Town centre since unless office accommodation is improved then major jobs growth will not happen. Why has Hyder ignored this major need and not identified the opportunity to improve it?

Hyder needs to comment on the transport barriers to economic growth that are identified above. Why does Hyder believe that the transport links are good when the evidence including the 2013 Suffolk Growth Strategy and New Anglia Local Enterprise Partnership 2014 Strategic Growth Plan indicate otherwise?

Deprivation and Living Environment There are nine wards LSOAs in the bottom 20% most deprived nationally as Sprites has been omitted and this needs to be corrected. The number of areas in Ipswich within the most deprived 20% of areas nationally has increased from 19 areas as recorded in the IMD 2007 to 21 areas in 2010. In absolute terms, the number of people living within the most deprived 20% of areas has risen by 2.5% suggesting that Ipswich has become comparatively more deprived since 2007.

The UK Peace Index⁵ reports that "Ipswich is the least peaceful local authority in the East" Institute for Economics and Peace, April 2013. Peace is strongly linked to deprivation in income, employment opportunities, health and disability, education and in access to housing and services. This report needs to be added to the evidence database.

Specific solutions are required to tackle deprivation in the most deprived wards. Why does Hyder not provide a recommendation to do so? Please explain how new homes in other parts of Ipswich will tackle crime rates in existing wards?

Housing The Ipswich AMR shows that the number of empty homes in Ipswich has increased from 2.2% (2010) to 3.3% in (2011) and on the 24th April 2012 had risen further to 2,075 from 1,918 (2011). Of these 685 have been empty for over 6 months, which is obviously not sustainable. This rise is greater than that experienced in Suffolk as well as regionally and nationally. Ipswich has a higher proportion of vacant dwellings than neighbouring Colchester and is also higher than regional and national averages. Authorities are required under the NPPF to bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. The Council has been too slow in doing this and needs to step up its efforts. Why has Hyder chosen to ignore this and not make a recommendation that the Council should work to reduce this number as a priority?

The Council's 2005 Private Sector Stock Condition Survey found that 36.9% private sector homes in Ipswich do not meet the decent homes standard, the main reason for failure being thermal comfort with 13.9% having a Category 1 hazard and that 47.8% of vulnerable households live in non-decent homes. Whilst these numbers will have improved, there is clearly a major need to develop existing private sector homes which will help tackle deprivation and health issues. Please explain why Hyder has chosen to ignore this key issue and not make a recommendation to develop the existing private sector homes. We congratulate IBC in the high standards of its housing stock and believe that Ipswich residents in the private rented sector also deserve to live in decent homes

Table 2.3 We have a number of suggestions to improve the Objectives and Indicators as follows:

⁵ <http://www.visionofhumanity.org/#/page/indexes/uk-peace-index>.

- ET1. This should include an indicator to measure congestion as this is the main cause of air pollution. Air quality should be assessed in respect of compliance with EC legislation.
- ET2. The key issue is whether new developments will detrimentally impact on the conservation of soil resources and quality. Why has Hyder omitted this? We strongly object to these indicators as it is not acceptable to omit any indicator that relates to conserving existing soil resources and quality for example a better indicator would be in relation to the quality and area of green space. There should also be an indicator that measures the percentage of PDL used as well as that being available.
- ET4. This should question whether the location of new homes is near to the location of new jobs as this is the key determinant regarding pollution from the daily commute. An indicator measuring congestion needs to be included here if not included in ET1.
- ET6. ET6a should specifically identify homes and transport emissions as this would be helpful in assessing other objectives.
- ET7. Clearly an indicator recording the instances of flooding in Ipswich is required to measure this objective.
- ET8. ET8a needs to measure farmland as well as this provides biodiversity and is a valuable and diminishing asset.
- HW1. Those most in need are existing residents suffering from unhealthy conditions and lifestyles. A better indicator than HW1b would be the levels of physical activity. The current indicator only covers people in work and thereby excludes the most vulnerable sections of society such as the ill, retired, children, unemployed etc. A measure of the level of a child's physical activity is far better than how they travel to school. As Ipswich has major depression issues, we suggest that an indicator measuring the number of people registered with their GP as having depression is a good indicator. An indicator of the level of substandard homes in Ipswich would also be a good indicator and should be considered for inclusion.
- ER1. This needs to ask whether developments will improve existing areas of deprivation. There should be an indicator for the number of people on benefits as this has a strong link with poverty and deprivation.
- ER2. This needs to have an additional indicator for the numbers of long term employed and to measure the average wage.
- ER3. This needs to consider whether development will improve the existing housing stock as this is by far the largest issue. A good indicator would then be the number of privately rented homes falling below a specific EPC rating, e.g. "E", as this is the sector containing the worst condition housing stock often lived in by the poorest members of society. A better indicator than ER3b would be to compare percentage split of dwelling types to actual requirements. A better indicator than ER3c would be to measure affordability.
- ER4. An indicator is obviously required to measure the net number of new jobs created in the Borough. Why has this been excluded?
- ER5. An indicator is required to measure the net number of new jobs created specifically in the town centre. ER5a will become meaningless as existing units are permitted to change use.
- ER6. This needs to have an objective and indicator for the number of net new jobs created in the Borough to be balanced with the number of new homes as this is the key thrust of the revised CS. There should be an indicator recording the net commuting figures for the Borough.
- ER7. The indicator recording the number of net new jobs created in the Borough could be included here. ER7b. Should measure the conversion rate of enquiries – having 100 enquiries might seem good but if none of them result in new businesses then it is awful.

SA Objective Compatibility This should be reassessed following any changes.

Paragraph 2.3.25 These are not “uncertainties” but likely outcomes unless further mitigation steps are implemented.

2.3.25 The SA underestimates 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

Looking at ET1 as an example, the number of AQMAs in Ipswich is increasing clearly demonstrating that new developments are already having adverse impact. The development of the Northern Fringe in particular will have adverse impacts on the AQMAs north of the town centre and around Norwich Rd and is also likely to have detrimental impact on the Colchester Rd/Heath Rd hotspot 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.

Paragraph 2.3.27 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. This paragraph needs to be amended accordingly. If not please justify why Hyder thinks there might be no increase in traffic at all.

Scoping Report and Paragraph 2.3.35 We have a number of concerns that our previous comments on the Scoping Report have not been adequately addressed and need to be revisited as a priority. We have included these in Appendix 1 using the original numbering with an explanation of our concerns in red.

Paragraph 2.4.4 The removal of a PDL target from Policy CS9 is a major change and therefore needs to be part of the SA.

Paragraph 3.1.1 The original SA was flawed because it did not look at alternatives to the Policies other than “do nothing”. The SA of the revised CS must assess alternatives to the policies in order to be sound.

Table 3.1 Our detailed comments on these Policies are provided in our response to the CS review itself. These need to be taken into account in the SA. The Table also needs to include an assessment of changes to CS9.

CS7 The proposed change is based on out of date data. The most recent data needs to be used. Also it should be noted that the housing growth target of at least 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring Local Authorities to make up the shortfall of 4,611 dwellings (Paragraph 8.83 last sentence refers)

CS10 The negative implications on brownfield development and town centre sites etc needs to be considered. The implications of the loose policy wording on phasing etc, which is not as strong as that included in the NF SPD, needs to be considered.

CS13 Hyder is incorrect in stating that the CS uses the latest EEFM data, which is EEFM August 2013. Why is Hyder not aware of this more recent data? Clearly the SA needs to use EEFM 2013 data and needs to assess IBC’s proposed growth areas relative to those identified in EEFM 2013, NALEP’s strategic economic plan and the Suffolk Growth Strategy.

CS14 The SA needs to take better account of Ipswich Central’s views on the Retail sector and assess how realistic the projected number of jobs really is.

CS17 The risk of unintended consequences needs to be assessed and the opportunity to eliminate these needs to be recognised.

Table 4-1

CS9 The wider implications of this change need to be considered alongside the options for keeping a target at a reduced level.

Paragraph 4.3.4 The SA needs to recognise that the CS needs to be better balanced to improve the lives of existing residents through redeveloping poor housing stock, tackling deprivation, reducing crime, improving health, getting people off benefits and back to work. The SA focuses too much on the advantages of new homes to the new residents and the averaging effect of these developments across Ipswich rather than on existing residents in existing wards who will remain disadvantaged and in need.

Paragraph 4.3.5 The policies do not consider the likely location of new homes to new employment sites, or that new residents in Ipswich Borough will have to commute outside of the Borough to new sites of employment. The policies do not consider the implication of having insufficient jobs to match the number of new residents looking for employment.

Paragraph 4.3.7 We are pleased that Hyder finally recognises the travel implications in relation to housing development of the Northern Fringe. However, this needs to be better reflected throughout its assessments.

Paragraph 4.3.10 In order to be effective, the following recommendations are required:

- Most recent population and employment data needs to be utilised. Without this the revised CS is unsound. Such data needs to take better account of specific local issues.
- 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 38% higher than the total forecast by the EEFM August 2013 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.
- A firm jobs growth target will help focus delivery.
- 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.
- Closer working with neighbouring authorities to ensure new homes are built near to new jobs is required. This needs to be considered as an alternative.
- Growth sectors in Ipswich Borough need to be better aligned with NALP and Suffolk's. In particular, the over-dependence on the Retail sector needs to be re-assessed.
- 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 Statement⁶. 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 as it is cheaper and easier for them to do so. 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. A PDL target needs to be reintroduced otherwise brownfield and town centre development will be detrimentally affected. This could decrease over time. This needs to be considered as an alternative.
- Policy CS10 and Infrastructure Table 8b) need to be revised to remove the risk of unintended consequences.
- The strategic infrastructure for both fresh water supply and sewage should be included as part of the CS focused review and included in the Infrastructure tables.
- Bus routes from the Northern Fringe to new sites of employment need to be direct.
- More needs to be done to improve the lives of existing residents.

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

Table 4-2

Education The SA needs to recognise that the CS does little to improve educational standards in existing schools and this omission needs to be rectified as a key objective. Note that the Suffolk Growth Strategy has a focus on boosting educational attainment and this needs to be better reflected in the CS. Some Ipswich schools have difficulty in attracting high quality heads and teachers, who are more likely to be attracted to new schools, with better sites and equipment. There is a risk that existing schools will find it even more difficult to attract high calibre heads and teaching staff.

Crime The SA needs to recognise that the CS does little to tackle crime in existing wards. Reducing the focus on brownfield development and building more homes without creating sufficient new jobs in the Borough risks higher crime levels in the most deprived wards.

Health The SA needs to recognise that the CS does little to improve health levels of existing residents, especially those without employment and living in the most deprived areas in sub-standard housing stock.

Housing The SA needs to recognise that the CS does nothing to help redevelop and improve existing sub-standard housing.

Sustainable economic growth It is not clear that this will be the case as the revised CS uses obsolete data and forecast jobs growth is a factor of 9 times the historic achievement over the past 20 years. We acknowledge IBC is showing commitment to achieving jobs growth in Ipswich through its Economic Development Implementation Plan but it needs a firm target for Ipswich Borough to be able to drive forward this plan and to include a job growth plan for the town centre.

Climate change etc This needs to reflect that the overall impact will be negative.

Water resources This needs to reflect the potential sewage issues associated with growth that have not been addressed.

Appendix E and Appendix F

As the jobs and homes data used in the Core Strategy is obsolete, we have deferred commenting on the specific Impact Assessments until more recent data is utilised.

Car Parking Policy

We believe there are inconsistencies in the CS car parking policy⁷ and ambiguity in relation to the Bury Rd Park and Ride which the Site Allocations DPD assumes will be reopened and enlarged whilst the CS deletes the reference to a new park and ride (Page 74). We note that the proposals for IP-One include an expansion of the existing car park capacity and question the need for this given that the existing long term capacity is rarely insufficient to meet demand, although there are a few pinch points that need to be improved. This is also inconsistent with the aim for more people to walk and cycle into the town centre and the reopening/extension of the Bury Rd Park and Ride as indicated in the Site Allocations DPD. The SA needs to consider these issues accordingly – please see our response to the Site Allocations DPD for further detail.

Brian Samuel & Rod Brooks

Submitted on behalf of the Northern Fringe Protection Group⁸

10th March 2014

Issue 1

⁷See Page 20 Para 6.7, Page 74 Policy CS17 and Page 110 Policy DM18.

⁸ 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.

Appendix 1

1. The NFPG has always supported an employment-led strategy. However, we argued that IBC's Core Strategy (CS) was not sustainable and therefore unsound as it was based on job targets that had no supporting evidence base and were clearly unrealistic and unachievable. The previous SA failed to recognise these legitimate and material concerns and omitted any form of assessment of the implications of the jobs target being unrealistic. Evidence now shows that the jobs target was indeed unsustainable and that the original SA was incorrect in assessing the CS as sustainable. This clearly shows that a more robust and evidence-based approach for the SA is required that better takes account of the views of the general public which have been shown to be informed and accurate.

Why has Hyder ignored the point we are making in its response? The UK recession started in Q2 2008 and was known at the time of Hyder's SA so it was obvious that delivery was not possible. This does not change the fact that the forecasts were not evidence based and were ludicrously over-optimistic when compared to historic trends. Please explain why Hyder failed to identify these obvious data flaws in its original SA?

2. We are disappointed that IBC has ditched the 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.

The approach is not policy compliant with the NPPF and guidelines as it does not use DCLG 2011 forecasts and is based on an old EEFM 2012 model rather than EEFM 2013. The revised strategy fails to take account of a large fall in economic migration and a massive drop in net commuting into Ipswich. It proposes an increase in housing that is not supported by a balanced increase in jobs. It does not contain a specific jobs target and over-estimates the growth prospects of the town centre when compared to the Suffolk Growth Strategy and NALEP strategic plan. How does Hyder intend to factor these points in its SA?

3. The SA needs to consider the implications of this key change in IBC's strategy and in particular consider the implications of new homes being constructed in Ipswich Borough that will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Previously one of the main arguments that the Northern Fringe housing development is sustainable was that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. The SA of the Northern Fringe will also need to be revised to take account of this.

Why has Hyder chosen to ignore that the net commute into Ipswich is falling from 11.8 (000's 2001) to 1.1 (2012 based on 2011 employee and 2011 resident employment data)? How will Hyder take this into account in its SA?

Please explain how Hyder considers the Ipswich – Felixstowe train service as a sustainable travel option when there is evidence that it is clearly failing and as the train station is not located near to the major sites of employment? We are pleased to note that Hyder recommends that improved train services from Westerfield station are required.

Currently, the Route 66 service takes 48 minutes from Ipswich train station to Martlesham. For someone travelling from the Northern Fringe it will take between 20-30 minutes to access this service (assuming that the proposed bus route servicing the Northern Fringe arrives at the Cattle Market bus station, which Route 66 serves the station and not Tower Ramparts bus station). It will therefore take around 75-80 minutes to get from the Northern Fringe by public transport to Martlesham Heath which is less than 7 miles away.

Why does Hyder think this will be a sustainable transport route that will be used by residents of the Northern Fringe? This would only work if there was a direct bus route from the Northern Fringe to Adastral Park. We are pleased to note that Hyder recommends that bus services from the Northern

Fringe to employment sites are required but Hyder needs to add that these should be direct otherwise few people would use them.

Why has Hyder chosen to ignore that IBC's forecasts show that there will be more working age people in the Borough competing for less jobs in its answer?

Hyder shows a major lack of understanding of the transport issues facing Ipswich. Please advise how Hyder has attempted to gain firsthand experience of these issues and incorporate this knowledge into its SA. Without having this knowledge Hyder's SA risks being unsound. How does Hyder intend to fill this apparent knowledge gap? We would be pleased to meet with Hyder to share our concerns and firsthand experience.

4. We support Paragraphs 2.20 and 2.21 of the IBC Executive paper REF NO: E/13/60 Northern Fringe - Draft Supplementary Planning Document Ipswich Garden Suburb and Sustainability Appraisal confirming that the Core Strategy Focused Review (CSFR) "will look at alternatives to the Northern Fringe allocation itself". The Scoping study must include details of how this will be carried out. This should include a "mapping" of the proposed sites of major employment and new homes in and around Ipswich and analysis of the potential impact and sustainability of likely travel routes. The process should also include an assessment of whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable.

Why does Hyder not identify that for the Ipswich Housing Market Area it is more sustainable to locate new homes near to the sites of new jobs and that this option is available under the duty to cooperate and should therefore be considered?

How will Hyder assess whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable? If Hyder simply assumes IBC's figures are correct then its SA risks being unsound.

6. The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the SA of the CSFR and in considering alternatives to the Northern Fringe allocation itself. Clearly this can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the Northern Fringe will pass through AQMAs and areas of pollution concern as residents travel to work.

Hyder does not yet fully assess the implications of each policy with regards to travel through ET4 and ET1 as Hyder assumes that new residents will either commute to new jobs in Ipswich town centre rather than the likely sites of new employment or use sustainable transport which is not a viable proposition for residents from most proposed new homes outside the town centre. Hyder also refuses to acknowledge that Air quality is worsening in Ipswich requiring new AQMAs and that residents will want and/or/need to drive through the current and proposed AQMAs. How will Hyder take these points into account to ensure its SA is sound?

7. In particular, the SA of the CSFR needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sproughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the Northern Fringe with residents commuting through Ipswich to access employment sites. The impact of utilising sites such as Grafton Rd, Cox Lane and Westgate for a larger number of new homes, rather than leaving them vacant, needs to be appraised.

Can Hyder explain, its assumption that people living on the Sugar Beet Site would need to travel through Ipswich to access employment sites? It is far more likely the majority would take advantage of the excellent access to the A14 and onwards. Of course there are existing employment sites nearby plus new ones that could be developed on the Sugar Beet site as a shared residential/employment site as well? IBC's housing growth target of at least 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring Local Authorities to make up the shortfall of 4,611 dwellings

(Paragraph 8.83 of the Core Strategy). So such sites as the Sugar Beet factory must be considered to help IBC deliver its targets. Hyder's comment that it cannot as IBC has no control over it implies that the CS is unsound as IBC has no control over delivering its housing target. Can Hyder confirm this or whether it will be assessing such options which are possible under the duty to cooperate? Suffolk Coastal is planning on building new homes to match new jobs created at Adastral yet Hyder in its previous response believes it is acceptable for IBC to also build new homes in the Borough for people to commute to Adastral. Hyder needs to be consistent in its process and appraisal.

8. The current CS allows for a phased approach for the development of the Northern Fringe and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire Northern Fringe without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full assessment of the rationale behind the proposed changes. This should include analysis of the comparative risks of unfinished sites and/or stalled developments being left on the Northern Fringe for whatever reason. This is already a major problem for Ipswich in relation to the waterfront developments, as a result of the unsustainable multi-starts that were allowed to commence and become a major blight on Ipswich.

Hyder's appraisal of revised policy CS10 does not fully consider the implications of multiple starts compared to the original CS10 as we detail in our response to the CS and Northern Fringe SPD consultations. As a minimum the proposals contained in the Northern Fringe SPD must be reflected in the CS and there should be further restrictions to avoid stalled developments and to ensure the required infrastructure delivery relative to the number of homes, especially in relation to the first primary school. Will Hyder reappraise this in light of our comments?

Specific comments

We have the following specific comments on the Scoping document:

- Paragraph 3.2.1 needs to reference the proposal for the Core Strategy to no longer be jobs-led but a housing-led strategy. The SA must compare and assess the relative benefits of these alternative strategic approaches and alternatives to the Northern Fringe allocation itself as committed to by IBC in the recently approved Executive paper REF NO: E/13/60.

The paragraph still needs to reference this fundamental change though. Why is Hyder not recommending that IBC uses the DCLG 2011 forecasts to assess housing need as referenced in the NPPF guidance and the most recent EEFM forecasts? These are obviously required for an up to date assessment otherwise the CS risks being unsound.

Hyder states that for "employment local and regional strategies aim to play to the area's sectoral strengths." Why has Hyder not identified that Ipswich town centre has not been identified as a major centre for new jobs in the Suffolk Growth Strategy or the NALEP Strategic Plan and that there is a mismatch between their employment growth sectors and those identified for Ipswich?

- Paragraphs 3.3.2 and 3.3.11 and Table 3-1 need to specifically reference the CSs of neighbouring authorities and the critical work of the Ipswich Policy Area Board given the duty to cooperate and the proposed approach to build homes in Ipswich Borough for people working outside the Borough. These are more important than the New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013, which is more of a wish list than an evidence-based document. The quoted growth forecasts are out of date.

Will Hyder include in Table 3-1 the Ipswich Policy Area Board's work, provide updated forecasts and include the recently released NALEP Strategic Plan which has more substance as these are all more relevant. If not, please explain why.

- Table 3-1 should refer to Ipswich Borough-specific data rather than quoting East of England data and should reference the most recent data e.g. the EEFM August 2013 modelling. This projects a lower level of jobs than previously.

	2011	2031	Increase
Population	133.7k	163.4k	29.7k (22.21%)
Resident jobs	63.2k	71.4k	8.2k (12.97%)

This means that additional residents will either have to commute outside of Ipswich Borough to find work or will be unemployed; neither of which is sustainable.

We are pleased that Hyder will take into account Aug 2013 modelling results but note that it has not yet done so. Hyder should therefore insist that IBC uses most recent data in its analysis otherwise the CS will be unsound. Please confirm this will be the case. If not please explain why Hyder believe it is acceptable to use out of date data.

- Paragraph 3.4.1.3 Ipswich Central’s vision for Ipswich needs to be considered <http://ipswichcentral.com/thebigdebate/> along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that “St Matthews Street and Woodbridge Road are both areas where NO₂ results were high. These areas have therefore undergone a detailed assessment and as a result AQMA’s will be declared. “.

Please confirm that Ipswich Central’s vision for Ipswich will be considered by Hyder in the SA. If not, please explain why?

Please confirm that the impact of the revised CS on the additional AQMAs will be considered in Hyder’s SA. If not, please explain why? The approximate sites of the AQMAs are known so there is no reason why they should not be considered.

- Table 3-2 needs to reference the proposed new AQMAs (as does Appendix B.7) as referenced above and utilise more recent data where available. There are also opportunities to improve cross-town transport infrastructure and access to the A14/A12. This will become a fundamental requirement if the CS is changed to housing-led as residents will need to be able to easily commute to employment sites outside the Borough.

The fact that new AQMAs are proposed still needs to be referenced here. Please explain why Hyder continues to ignore this worsening environmental issue in its report.

Please confirm that Hyder’s SA will consider the additional cross-town transport infrastructure and improved access to the A14/A12 that will be required to mitigate the impact of the change in strategy to a housing led one? If not, please explain why?

- Paragraph 4.1 As the CSFR proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough.

As mentioned earlier, the EEFM 2013 shows that the net commute into Ipswich is falling from 11.8 (000’s 2001) to 1.1 (2012 based on 2011 employee and 2011 resident employment data)? With the proposed shift to a housing-led strategy and lack of new jobs being created in the town centre, residents will have to increasingly commute to jobs outside Ipswich Borough. This is obviously a major sustainability issue that must be considered fully in the SA. How will Hyder take this into account in its SA?

- Paragraph 4.2.1.1 needs to make clear that the proposed CSFR is no longer a jobs-led strategy but a housing-led strategy. To fail to mention this fundamental change is misleading and lacks transparency. Likewise the major proposed changes to CS10 need to be outlined here i.e. the intention to allow

simultaneous multiple starts across all three areas of the NF without restricting the number of construction sites at any one time etc and prior to the agreement of a Masterplan also needs to be specifically mentioned.

As these are major changes they should still be referenced here. If not, why not?

- Paragraph 4.2.2.1 As stated above, the SA of the CSFR needs to assess the alternative of an evidenced-based jobs-led strategy. It also needs to assess the alternative of a phased and controlled development of the Northern Fringe that does not allow multi-site starts or places restrictions on when the three areas of the NF can be developed and/or on the number of sites that can be developed in any one area at the same time.

Hyder's SA does not assess the alternative of an evidence based jobs-led strategy. It does not take into account;

- most recent EEFM forecasts,
- major net-commuting changes,
- the Ipswich SHMA uses obsolete DCLG and not more recent 2011 data,
- recent local economic migration figures,
- that Ipswich town centre is not identified as a major growth centre in either the Suffolk Growth Strategy or NALEP Strategic Plan,
- an over-reliance of IBC on major retail development in the town centre.

Please explain how Hyder intends to incorporate these key issues into its analysis.