



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

NFPG Comments on the Ipswich Garden Suburb Supplementary Planning Document Sustainability Appraisal and Strategic Environmental Assessment Report by Hyder

Please find the following comments on the above Sustainability Appraisal (SA) consultation. They should be read in conjunction with our comments on the Ipswich Garden Superb Supplementary Planning Document and the focused review of the 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 SA of this SPD must therefore be based on the best data available, which is not the case as it is based on the current Core Strategy which uses obsolete data, most notably East of England forecasts. It fails to take account of most recent data for example DCLG 2011 projections or EEFM 2013 forecasts. This SA is therefore unsound.

Para 1.2.1 and 1.2.2 The Sustainability SA of the Ipswich Garden Suburb (also known and referred to as the Northern Fringe) SPD specifically needs to consider the proposals contained in the concurrent Focussed Review of the CS. Paragraph 9.1.6 of the revised CS states that “Any planning application for the development of the area, which is submitted before the adoption of the Core Strategy Focused Review or the Supplementary Planning Document, will be required to have regard to the content of emerging policy and guidance in Policy CS10 and the Supplementary Planning Document respectively”. We believe that the SA of the Northern Fringe SPD also needs to follow this guidance and specifically include an integrated assessment of the SPD within the context of the revised CS.

The burden of the suite of concurrent consultations on the general public is already immense. It is unreasonable to expect the general public to comment on a revised CS, Site Allocations DPS and respective SAs and then to comment on the SA of the Northern Fringe SPD in the context of the old CS document.

The SA of the Northern Fringe SPD must to be based on the best data available to be sound. Currently Hyder examines the sustainability of the Northern Fringe development in relation to the outdated Core Strategy that was consulted on in 2011 and based on unachievable and discredited housing and jobs targets dictated by the East of England Plan, which has been consigned to the scrap heap. This SA must take into account the most recent DCLG and EEFM 2013 forecasts and any issues specific to Ipswich in order to be sound. Hyder needs to include this as a key recommendation as this could affect housing need and the phasing of the Northern Fringe development and will certainly impact on the travel patterns from the Northern Fringe to new places of employment.

Table 2-3 Please refer to our comments on Table 2-2 in the SA of the revised CS, which equally apply here. These need to be reflected here.

Transportation Direct bus routes from the Northern Fringe to sites of new employment will be required. The Ipswich – Felixstowe train service has been reduced and substantially deteriorated in terms of reliability. It needs to be considerably improved in order to provide a sustainable solution and a specific recommendation should be included by Hyder accordingly. Please see our comments on the CS SA.

Table 2-5 Please refer to our comments on Table 2-3 in the SA of the revised CS, which equally apply here. These need to be incorporated here and the SPD needs to be reappraised accordingly.

SA Objective Compatibility This should be reassessed following any changes.

Paragraph 2.3.18 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.

Para 2.4.5 The focussed review of the CS proposes changes to these. This appraisal is out of date and needs to be revised accordingly.

The change to Policy CS9, which we oppose, removes the Previously Developed Land (PDL) target. Allowing multi-site development across the entire Northern Fringe from the outset and removing the PDL target will result in new homes mainly built on the greenfield land of the Northern Fringe as it will be cheaper and easier for developers to do so when compared with brownfield land. This will limit the regeneration of the town, especially the town centre, which results in major sustainability issues. The effect of this alters the SA considerably. We would like to see a target or a small number of time dependent targets for PDL reinstated to ensure regeneration sites are given adequate priority over green field sites. Unless this is included in the revised CS, this SA is flawed and needs to be revised accordingly.

This SA must properly analyse the impact of allowing multiple starts across the whole of the Northern Fringe at any one time. Multi-site development of the entire Northern Fringe from the outset will work against the plan's 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.

Table 4-7 This needs to take account of the location of the Northern Fringe relative to the proposed new sites of employment, which are located away from the Northern Fringe. Please refer to our comments on the revised CS, the NALEP strategic economic plan, the Suffolk Growth Strategy and the 2013 EEFM modelling data. Ipswich town centre is not identified as a major employment growth centre and more Ipswich Borough residents are already having to commute out of the Borough to find work. There are already major transport problems in Ipswich as identified in the Ipswich AMR, the NALEP strategic economic plan, and the

Suffolk Growth Strategy, which will clearly be worsened by the Northern Fringe development.

Building this quantity of new homes on the Northern Fringe will result in many new residents having to commute outside of the Borough for work. This is unsustainable when compared to building new homes near to where new jobs are being created. Hyder's assessment continues to be based on the wrong assumption that the majority of new jobs will be based in Ipswich town centre and residents of the Northern Fringe will walk, cycle or use public transport to work. Paragraph 4.4.13 does begin to acknowledge these issues but then fails to adequately take them into account in its appraisal. New residents will use their cars to commute to the new employment sites outside of the Borough thereby reducing air quality and worsening traffic effects.

The effects of this are clearly negative in relation to ET1, ET4 and ER6. Carbon emissions from commuting will also detrimentally impact on ET6. The assessment needs to be re-scored accordingly. Connectivity for ER2 and ER4 should also be scored as a negative. Hyder needs to take better account of the traffic issues that are well known to all Ipswich residents and the fact that the major new sites of employment are not located near the Northern Fringe.

Para 4.2.5 This needs to be corrected to recognise that “the Northern Fringe area is not well connected to jobs by foot, bike or public transport”.

Para 4.3.4 notes that the majority of residents would be employed in the town centre and other areas in Ipswich or nearby boroughs. There are massive difference between people commuting from the Northern Fringe into the town centre compared to commuting out of Ipswich Borough to other boroughs that have not be taken into account. The SA needs to consider and reflect this better.

Section 4.3 The appraisal needs to acknowledge that there are negative effects in relation to ET1, ER4 and ER6 in relation to transport/commuting.

Para 4.3.7 This needs to recognise that whilst the Northern Fringe is not adjacent to any Air Quality Management Areas, residents will need to commute through AQMAs to get across town and access the A14/A12 and other new sites of major employment. Air quality assessments recommended by Hyder need to extend to potential commuting routes from the Northern Fringe and not just be limited to adjacent roads.

Section 4.6 This needs to take better account of the off-site issues of the Northern Fringe development as we have identified above and in our response to the CS review.

Section 4.6 and Paragraph 4.7.4 assume that the replacement of the Valley Rd roundabouts with Tuddenham Rd and Westerfield Rd with traffic lights linked to the Urban Traffic Management and Control (UTMC) system is the best solution, without any evidence of this being the case. Although the Travel Ipswich scheme is not fully implemented, there are concerns whether the scheme is actually working. The traffic lights appear to be slowing down traffic flows. Until the system has demonstrated its effectiveness neither of these roundabouts should be replaced with traffic lights. The SA needs to ensure the best design of these junctions to help sustainable travel and must recommend that these roundabouts are not replaced without business case justification.

Section 4.7 We note that the Northern Fringe SPD proposes controlling the risks of multiple starts (see our response to the CS review).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. The SA needs to recognise the risk and recommend that these proposals are also incorporated in the CS to ensure that they are followed.

The development sequencing of the Northern Fringe must be reviewed once the housing needs and target figures have been reassessed using recent data. The SA needs to include this as a recommendation.

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. The SA should recommend this accordingly.

The Northern Fringe land allocations should clearly show the allocation for Sustainable Urban Drainage (SuDs) since this forms a key aspect of the design and will impact on both housing densities and the amount of housing. We are still not convinced about the effectiveness of the proposed SuDs system, which does not appear to provide a solution that fully fits with the analysis and recommendations of the Ipswich Borough Drainage Engineer. To ensure sustainability all revisions to the proposed SuDs scheme made by the Environment Agency and the IBC Drainage Engineer must be incorporated into the design. The SA should recommend this accordingly.

Table 1 We support the inclusion of this table in the CS but have a number of concerns that have not been picked up in the SA but can be easily resolved by simple recommendations.

- We note that the provision of the country park is included in this table but omitted from Table 8b) in the revised CS. We assume this is an oversight, which needs to be corrected. If this is not included in the CS document then the Appropriate Assessment will have to be revised. This SA needs to identify this issue and recommend that it is corrected.
- Traffic management scheme for Westerfield village, The Crofts and other locations. This needs to specifically reference Whitton and the Dales as well.
- 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.
- 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.
- 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.
- 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 as been reached.

- 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 this would 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?
- There is a similar but even larger risk in relation to any required strategic improvements to sewerage system. We are concerned that major infrastructure works will be required to allow sewage treatment from the Northern Fringe development at Cliff Quay STW and the worrying lack of information from Anglian Water on this issue. We note that there are existing odour issues at Cliff Quay STW, which are detrimentally impacting on local residents and the ability to develop adjacent sites. The Ipswich Chapter of the Water Cycle Study (WCS) (by Royal Haskoning for Haven Gateway, 2009)¹ 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 have identified the main problems and restrictions in the system as being related to the volume of surface water discharge entering their combined sewer systems, resulting in flooding and the underperformance of a Sludge Treatment Centre which impacts heavily on the STW. Anglian Water stated at the Community Steering Panel meeting of 12th February 2013 (see minutes) "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 here as this could create major disruption across Ipswich and jeopardise the timing, size and cost-effectiveness of the development. For instance, if say 499 homes could be readily connected to the existing sewage system without major investment and that any more would require major investment what might this mean for the timing and delivery of the Northern Fringe development?

- 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. If major sewage infrastructure works is required after say 499 homes this is a very real risk that has been overlooked.

¹ http://www.ipswich.gov.uk/downloads/Haven_WCS_Stage_2_-_Ipswich_specific_results.pdf

The SA needs to make appropriate recommendations to resolve these issues.

Paragraph 4.8.1 It is incorrect to limit the increase in road traffic to “major roads” as there will be increased traffic on all through-roads around the Northern Fringe as drivers seek to avoid the inevitable congestion that will arise from the development. This needs to be recognised in this paragraph accordingly.

Paragraph 4.9.1 As there are insufficient jobs being created near to the Northern Fringe, it is inevitable that the residential development within the Ipswich Garden Suburb will result in new residents commuting both across and outside the Borough to seek employment. This will increase traffic, not just on main roads, but on rat-runs to the sites of new employment. This SA needs to take better account of this issue.

Recommendations

We support the recommendations made by Hyder, which should be incorporated into the Northern Fringe SPD and have the following additional recommendations as well as those we have raised throughout this submission:

- Page 4 Forward We are disappointed that the Forward of the SPD is extremely misleading as it states that "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". Whilst it is true, this is neither the Council's intention nor what the Council is proposing in the focused review of the Core Strategy. As Council has stated is a material consideration when considering the Ipswich Garden Suburb (IGS) SPD this should have been accurately stated upfront. Hyder should recommend that IBC be upfront and clear about its intentions with regard to multiple starts.
- 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. Hyder must recommend that this be reinserted otherwise the public will have little faith in IBC's green vision.
- The NF SPD omits any information on hydrology or topography. This is a major oversight that needs to be addressed before the SPD can be agreed. The SA needs to identify this issue and make the necessary recommendation to address it.
- 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. This detail clearly infringes item I. 5.45 (page 106) "Dimensions for Gardens do not include rear Parking spaces". We would like to see Hyder recommending that this detail is removed and that Hyder reinforces the need to comply with this policy. 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 away from the Northern Fringe would consider this to be inadequate and would result in undesirable alternative 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.
- We note that page 106 specifies a minimum depth for back gardens to be nine metres. We believe that this is insufficient to provide the high quality garden suburb development that is intended. We would like to see a recommendation for a figure in

the region of 12 metres for a three bedroom dwelling and/or an equivalent square area for those wider gardens.

- 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 CS focussed review. Hyder should be recommending that the 12ha requirement be reassessed in the light of such evidence as we 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. Hyder should be recommending that 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.
- Hyder should also be recommending that an additional requirement be included in the SPD for all sports pitches to be provided on well-drained flat land otherwise they will not be fit for purpose.
- Page 152 Chapter 9 Long term management and maintenance of the SPD requires clarification. It is not clear what the proposed annual service charge levied upon residents and businesses 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), which is intended to be Suffolk County Council. Likewise residents should not be expected to pay for the maintenance of the country park which will benefit all Ipswich residents and should therefore be funded by Ipswich Borough Council as is currently the case with other similar assets such as the parks, as these are well-maintained and highly regarded by residents. We would also expect that general maintenance of roadside grass verges, trees etc be picked up by the relevant authority funded through council tax as is the case for existing residents and developments. To expect residents to pay an additional maintenance charge for these assets whilst paying council tax that covers maintenance charge for these types of assets used by other residents and not themselves is unfair and clearly discriminatory. Placing an additional charge on businesses in addition to business rates will deter businesses from the Northern Fringe, which will undermine and damage the proposed local and district centres. 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 for domestic residents. We would like to see Hyder include recommendations to this effect.

Table 6-1 As a general comment, this is confused as it shifts between Northern Fringe specific indicators and Ipswich Borough indicators, which results in inappropriate significant effects and indicators being identified. A full review of this table is required.

ET1 This should not be limited to the Northern Fringe area but should relate to traffic arising from the Northern Fringe.

ET4 and ER6 We would like to see some monitoring and assessment of the level of rat-running. Monitoring of train stations should be limited to Westerfield train station. Please can Hyder clarify which underground stations it recommends monitoring?

ET5 We suggest that this is better-related to the Northern Fringe.

HW2 We suggest better indicators such as the numbers of people registered with their GPs with depression as per the Ipswich AMR, the number of long term unemployed and the number of people on benefits. Measuring the number of cultural programmes is a poor indicator of deprivation and social exclusion, which shows a lack of understanding of the real needs of deprived communities.

ER2 This should not be limited to investment in the Northern Fringe. Obviously there will be considerable investment in the Northern Fringe as it is a Greenfield site. A better indicator will be the net number of new jobs created in Ipswich Borough.

ER4 This indicator does not make sense as the Plan area is a greenfield site so there can't be any reduction in unemployment because there is no one living there other than Red House Farm. The same issue applies to **ER5**.

CL1 needs to measure qualifications of young people.

CD1 Why does Hyder expect increased crime rates? In order to be sustainable we would expect crime rates (e.g. per population) to fall as this is intended to be a high quality development.

We were pleased to be provided with an opportunity to comment on the draft SA of Northern Fringe SPD but are unhappy with the response to the Executive² to several of the issues we raised. Some of these were not adequately reported and others ignored. It undermines the credibility of the Council to deny that multiple starts were not a current proposal when we knew it was under consideration at the time of our response. The impact of allowing multiple starts is still not fully appraised as we detail above, especially in relation to the detrimental impact on development of brownfield sites in deprived areas and the town centre. The Sustainability Appraisal still does not adequately take account of several of the key sustainability issues we previously raised on the location of new jobs, potential for jobs growth/prosperity, traffic, air quality and sewage disposal as we have identified in our preceding comments.

We were disappointed that the Council decided not to fully and accurately report our comments on a sustainable economy in its paper to IBC Executive. The Council's response also selectively ignored the evidence base, overstated the jobs potential for residents from the Northern Fringe in the town centre and fails to recognise that the a radial bus service will not be attractive to residents of the Northern Fringe when commuting to the sites of new jobs. See our response to the review of the CS for full details.

The Council's response to our comments on scoring is very disappointing, comes across as condescending and completely ignores the valid points that we have made. We submitted our comments in good faith under the impression that they would be considered professionally. To dismiss all of our valid concerns on scoring with the flippant comment that "this is a matter of opinion" implies that the Council has no intention of changing the scoring levels of

² As reported to the IBC Executive on 26 November 2013.

the SA regardless of consultation responses. This would be in breach of IBC's Statement of Community Involvement and therefore render the consultation process unsound.

Brian Samuel & Rod Brooks

Submitted on behalf of the Northern Fringe Protection Group³

10th March 2014

Issue 1

³ 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.