



Save Our Country Spaces (SOCS)

Ipswich Draft Local Plan Examination Statement On STAGE 1 - MATTERS AND QUESTIONS

Matter 1- Legal Requirements, Duty to Co-operate and Cross Boundary Issues

Summary

Since 2003, SOCS, a local resident's stakeholder group, have worked in the public interest, informing the wider public about the relevant Local Plans, the current draft Ipswich Local Plan and the various changes in legislation, which have impacted on this process. This includes the 2004 Planning & Compulsory Purchase Act and 2012 regulations, the 2011 Localism Act (and 2012 Statutory instruments) and the National Planning Policy Framework (NPPF) and guidance 2012.

We, as a community group representing local residents, embrace Brundland. Our principle concerns relate to the issues of "Sustainability", viability and deliverability. This is in relation to *our communities local knowledge and understanding* of local need for housing, jobs etc. We also have some understanding about the *flexibility* required to be built into the local planning system to respond to changing needs and changing conditions; i.e. economic, environmental and social.

Ipswich, is an identified part of the regional 2001 Growth Point with partner LA's.

Growth, however, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health. The potential to secure a "sustainable future" for the existing local population, future populations and future generations is an imperative not demonstrated by this plan.

This plan, we suggest, has not adapted to the changes since 2001 (economic, environmental and social), which we now find ourselves grappling with in 2016. In our view, it fails to demonstrate the *flexibility* required and necessary to respond to the changing needs and changing conditions. It therefore is unlikely to serve and deliver growth reliably, adequately, sustainably, viably and ensure deliverability up till 2031.

In our opinion, the IBC CS Review plan is unsound, potentially unlawful and requires substantive further work, including:

1. Development of a cohesive approach and IPA policy and joint plans, which all neighbouring LA sign up to. SOCS suggest that the border authorities such as Essex (Tendring LA) should also be included as happened with the Haven Gateway study.
2. Using the latest evidence to re-evaluate the housing OAN.
3. As a matter of urgency, 'sign up' neighbouring LAs (including Essex) to a joint project plan for scoping the un-met housing demand within IBC, obtaining agreement to jointly work together on meeting this demand, identifying and evaluating potential solutions and establishing ownership of the delivery components. This would underpin the housing targets in the CS. As part of this process, recognise and plan for the possibility that the IGS may not be deliverable in the timescales envisaged, due to its impact on traffic and deliverability of key infrastructure including wastewater and road infrastructure.
4. Thoroughly assess the cumulative and cross-boundary effects of traffic and emissions and propose

- robust mitigation where needed.
5. Recognise the growing concerns on health impacts from air pollution, which currently are effectively under the radar or ignored.
 6. Re-assess the jobs growth data taking into consideration IBC's plans for the Sproughton Sugar Beet Site, more recent evidence and data on the number of new jobs being created in the Ipswich Borough and the town centre and the concerns raised by the Peter Brett Viability Study.
 7. The CS review must be also be mindful to assess against the emerging Housing & Planning Bill.¹
 8. IBC must also factoring in that the NPPF now appears to take precedence over Local Plans ; often superseding and overriding the 2004 Act and 2012 regulations & the 2011 Localism Act and 2012 Statuary instruments.
 9. The "Climate Change" agenda is insufficiently addressed in SA and SEA wok or in EIA work and Environmental Statement's. This is contrary to NPPF *10. Meeting the challenge of climate change, flooding and coastal change*.

We would like to see an agreed timetable for the re-submission of the revised plan and for the current Plan to remain at least a "material concern" for planning applications.
We also note that the adoption of the draft IGS SPD depends upon the adoption of the draft CS.

In the event that the Local Plan is withdrawn for further work we would like the IGS SPD to remain as a 'material consideration' for IGS planning applications.

The following points ,drafted and formatted by the other local residents group with whom we collaborate, NFPG, have been adapted by SOCS.

1.1 Are the likely environmental, social and economic effects of the plan adequately and accurately assessed in the Habitats Regulations Assessments and the Sustainability Appraisals (SAs)? Do the SAs test the plan against all reasonable alternatives?

In our view no.

Habitats Regulation Assessments

Natural Environment and Rural Communities Act (NERC) 2006

The plan does not reliable demonstrate likely compliance with NERC- or that it is likely to fulfill the Biodiversity Duty and ensure that there is **no net loss of biodiversity on a site, particularly on the IGS.**

We note from the Ipswich Policy Area Green Infrastructure Report² 'The planned country park at the Ipswich Garden Suburb (IGS), whilst providing a key element of mitigation in relation to Habitats Regulations Assessment, would not address deficiencies under the Nature Nearby standards within the north-west part of Ipswich and around the Claydon / Great Blakenham area.' We understand from the IGS Developer Steering Group minutes (on the IBC website) that Ipswich Garden Suburb (North Fringe) landowners do not consider it is their role to mitigate for **existing longstanding deficits (outstanding since the 1960's)** nor should a requirement be placed upon them to provide relief to the local Ramsar sites which are under pressure; pressure from their own proposals as well as the compound and cumulative effects from other neighbouring development. This is contrary to the excellent 2008 Haven Gateway Green Infrastructure Strategy and Report (HAGGIS), which was required to guide the region as a "growth point" in 2001.

¹ [Housing and Planning Bill](#) 24.02.2016

² Conclusion bullet xiii, Update of the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area, August 2015, Ipswich Policy Area report, https://www.ipswich.gov.uk/sites/default/files/ipa_green_infrastructure_report_-_final_published_october_2015.pdf

IBC and other local authorities such as Suffolk Coastal, have more recently built their own local green infrastructure plan policies, as well as the Ipswich Policy Area the Green Infrastructure Report, on the 2008 HAGGIS, Haven Gateway work.

Sadly, the policy steer contained within the Haven Gateway Green Infrastructure Strategy holds little sway under NPPF- it is no longer being appropriately taken on board or given due weight in the courts, in local planning decisions, or in Planning Appeal decisions by PINS or Secretary of State. There appears there is little local determination on the issue of green spaces and sustainability. More often this issue is decided in the Admin courts or under EU Environmental Law and EIA legal cases.

There is currently no delivery mechanism to ensure the timely delivery of the IGS Country Park as an effective mitigation strategy to safeguard the Stour and Orwell Estuary Special Protection Area, protected under the Habitats Directive. As such the Core Strategy (CS) is unsound. A delivery mechanism needs to be determined and an alternative included in the CS should the IGS Country Park not be deliverable by the required timescales.

Sustainability Appraisals

The SA is unsound as it doesn't utilise the best available baseline and modeling data e.g. the latest DCLG March 2015 housing projections nor the June 2015 ONS migration data, which significantly lower the objectively assessed housing need.

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

Therefore, "*serious adverse effects*" cannot be properly identified, as required under compliance with the NPPF (**Achieving Sustainable Development NPPF 6-17**) for either the CS or development and control purposes. This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render major IGS planning applications inappropriate and premature. It also potentially renders stakeholder responses to planning applications a problem.

The plan fails to reliably demonstrate that IBC can secure the required compliance (along with partner stakeholders such as Suffolk County Council, Environment Agency etc) on;

- *NPPF- 94 Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.*
- *NPPF- 99 Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.*
- *NPPF-103 When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere*

The SA fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues, specifically to note the possibility that the viability of the development of the IGS may not be achievable due to the severe impact on traffic and lack of sewage infrastructure.

Part of the plan for the IGS fails to take adequate account of;

NPPF- 11. Conserving and enhancing the natural environment

109 The planning system should contribute to and enhance the natural and local environment by:

- *protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *recognising the wider benefits of ecosystem services;*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

Transport

Whilst Section 4.3.1 of the SA recommends “updated traffic is undertaken and that all future applications continue to thoroughly assess the cumulative effects of traffic and emissions and propose robust mitigation in line with other policies within the CS and the IGS SPD” this **has yet to be done**. Also a traffic assessment of the effect of permissible multiple starts across the IGS needs to be done. There is no evidence that a sustainable traffic solution can be implemented that will allow the proposed build out of the IGS. Suffolk County Council stated in relation to the 2014 Mersea Homes/CBRE Global Investors (Planning Application 14/00638/OUTFL) Traffic Assessment of the IGS “More recent assessments of the planning application for proposed development in the Northern Fringe have, however, suggested that there are not, currently, identified sustainable transport measures to ensure that the development impacts are adequately mitigated. **Given the key role of the IGS, this makes it more likely that the planned development could give rise to severe traffic congestion across the town's road network.**”³ A revised traffic assessment for the IGS had yet to emerge which, given the length of time this has been worked on, is an indicator of the scale of the problem being addressed.

SOCS would like to draw the Planning Inspector's attention to the fact that developer traffic surveys are more often characterised by taking place in “atypical conditions”, such as the recent half term school holiday and limited, by the failure to collect traffic flow data to assess likely impacts (in Tuddenham on resident's health from pollution and accident risk) on villages north of the IGS site like Tuddenham village, which has a particular problem of road convergence, width limitation and closeness of properties to the road edge.

Air Quality⁴

The SA still appears to use 2010 air quality data as its baseline and continues to fail to acknowledge that air quality is worsening in Ipswich and will potentially require a larger, town-wide AQMA or the widening extension of existing AQMAs. The SA has not embraced recent Legal case rulings on Air Pollution and congestion, nor new requirements for the UK under EU legislation, directives and court decisions. Tuddenham village has a particular problem of road convergence, width limitation and closeness of properties to the road edge and deserves to have air quality monitoring data collected.

Wastewater

The SA fails to take sufficient account of the wastewater issues arising from the proposed expansion of Ipswich (NB: Anglia Water stated a resolution would be found between landers and themselves and proposals delivered by March 2013 and this still has not happened). Paragraph 6.92 of the NALP draft Strategic Plan, January 2014 recognises that the scale and cost of major new connections in relation to water supply and wastewater infrastructure (including treatment plant), is currently inhibiting the progress of some strategic sites in Ipswich. The Water Cycle Study⁵ shows Cliff Quay (Ipswich major Sewage Treatment Works (STW)) with a lack of headroom to cope with the projected growth of both housing and employment. In addition, according to Anglian Water the pipeline capacity from the north of Ipswich to the Cliff Quay STW is at capacity and to date no viable solutions have been proposed for the IGS wastewater infrastructure.

³ [Recent case law and decisions on congestion and air pollution. Client earth and others.](#)

⁴ <http://www.bbc.co.uk/news/uk-england-beds-bucks-herts-35458600> East England towns and cities 'have illegal NO2 levels'

⁵ http://www.ipswich.gov.uk/downloads/Haven_WCS_Stage_2_-_Ipswich_specific_results.pdf

Should a new sewage pipeline be required from the north of Ipswich through the town to the Cliff Quay STW, as suggested by Anglian Water⁶ it will severely impact upon the development timescales and viability of the IGS. The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by a failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the plan period and plan for its provision. This is a major failing of both the SA and the CS making them unsound. The recent EIA scoping material submitted by Crest Barton Willmore failed to flag up this area of concern and possible impacts.

Potable Water

Supply was an identified issue in 2006 by Anglian Water and is a likely worse and growing problem now.

Economy

The SA assumes the forecast jobs growth will take place in Ipswich town. We have seen neither evidence of this nor any data showing the net number of new jobs being created in the Borough and the town centre under the current CS. This assumption needs to be justified.

It fails to take account of the Peter Brett study⁷ into the viability of the Ipswich Development Plan which calls into question the viability of developing new offices, industrial units and warehousing and large retail units in Ipswich. Para 8.3.2 states “none of the office development scenarios are viable” and Para 8.5.1 “industrial and warehouse development in Ipswich is not viable”. We note that the EEFM 2014 data shows that to meet the forecast employment growth office floor space will need to increase by 36% i.e. an additional 94,165 sq m (i.e. over 1M sq ft which equates to accommodation for approximately 7,850 people). It also shows warehouse floor space will need to grow by 17,103 sq m but forecasts industrial floor area will contract by 18,560 sq m. The SA needs to take account of the outputs from this study in its assessment in order to be sound. IBC has recently purchased the Ipswich Sugar Beet site, which is outside the Borough and designated as employment land. The SA fails to mention this or account for any impact of this on the town centre economy.

Reasonable alternatives

In our view, the original SA was flawed because it did not look at alternatives to the Policies other than “do nothing”. For example one reasonable alternative would be through cooperating more closely with other local authorities and locating new homes nearer to new sites of identified employment growth (as identified by the New Anglia LEP and the Suffolk Economic Growth Strategy – note Ipswich town centre is not one of them)). Although we have suggested this alternative over the past 5 years, it is only now that IBC recognise it needs to be done to accommodate the un-met housing demand identified within the draft CS.

The SA fails to recognise that it is unsound to allocate the entire IGS when its delivery may not be viable over the timescales of the plan. To lower the dependency of the CS on the IGS, the SA should be recommending the inclusion of a ‘Plan B’ based on co-operating more closely with neighbouring local authorities to locate new homes nearer to identified employment growth sites.

Taking full account of cumulative effects

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

We also note that SA does not assess the effects of around 4,000 new dwellings in neighbouring authorities to meet the IBC un-met demand.

⁶ Bullet 3.4 Minutes of the Northern Fringe Community Steering Panel 12 February 2013

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

We maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.

1.2 Is the plan compliant with: (a) the Local Development Scheme? (b) the Statement of Community Involvement? (c) the 2004 Act and the 2012 Regulations?

No

As the 2012 regulations look at “Sustainable development” (and interpretation of Sustainable Development in regard to the NPPF) we feel this plan is not sustainable, possibly not viable and possibly not deliverable.

1.3 Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters of relevance to the plan’s preparation, as required by the Duty to Cooperate?

No

Certainly not in relation to **Duty to Cooperate** with other authorities.

We suggest a failure under the **Localism Act 2011, and the (Planning & Compulsory Purchase Act 2004)- Section 33A and Section 20(5)(c)** which places this duty on Local Authorities in the preparation of Local Plans. Failure to demonstrate this is will suggest the plan to be unsound, potentially unlawful and open to challenge at Judicial Review.

Liaison with neighbouring Local Authorities (LAs)

A main vehicle for IBC to liaise with neighbouring Local Authorities is via the Ipswich Policy Area Board. Prior to 2013 the IPA Board met infrequently with little tangible output but since then it has met fairly frequently (www.ipswich.gov.uk/content/ipswich-policy-area) and published minutes and 4 papers of its activities(namely Green Infrastructure, Boundary topic paper, IPA illustrative Map and a Land Availability topic paper). In terms of public transparency the IPA has been very reluctant to publish its work programme, working papers and to engage with the public. The IPA should not be seen as just a talking shop but the effectiveness should be judged on the results achieved. To date we have seen no evidence of outcomes of the IPA working together to deliver housing or key infrastructure like freshwater, sewage and transport.

There has been some evidence of interworking on economic growth but no concrete interlinking plans, objectives and deliverables.

IBC has made a major investment by purchasing the old Sugar Beet factory brown field employment site in Babergh, but there is no mention of how this could link into employment plans. In fact we could find no mention of it in the IPA minutes, the draft Ipswich CS or the draft joint Babergh & Mid Suffolk CS.

We welcome the revised terms of reference Oct 2015, which should provide greater focus but they are very late coming.

Housing is a key strategic cross boundary matter, particularly considering the constrained physical boundary of Ipswich, which presents a constraint to growth. It would be reasonable to expect that this would be a key focus of the IPA. However this does not appear to be the case:

- The only mention of Ipswich housing supply issues that we could find in the IPA minutes is 5th Sept 2014 2.1 & 2.2. The former says that Ipswich BC has enough

housing land supply for the first 10 years of the CS to 2024. 2.2 talks about a twin track approach to plan for the period beyond the next 10 years to identify housing and employment needs.

- No neighbouring LAs mention an Ipswich housing shortfall in their adopted Local Plans or Authority monitoring Reports or the need to help Ipswich make up the unmet demand.
- The draft Joint Babergh & Mid Suffolk CS, (which has recently undergone regulation¹⁸ public consultation) mentions in section 2.6 'Work on the Ipswich Borough Council Core Strategy Focussed Review has indicated that there could be approximately 2,000 dwellings of un-met housing need towards the end of the Local Plan period (2031). A collaborative approach between the Ipswich Housing Market Area local authorities (Babergh, Ipswich, Mid Suffolk and Suffolk Coastal) will be undertaken in order to establish the most sustainable approach to providing for this need – it is likely that this will be addressed through a wider joint Local Plan document approach starting in 2016'. The latter is also mentioned in the Ipswich Local Development Scheme.
- There is no record in the IPA minutes that IBC has a 5-year housing supply problem, nor any recognition of this problem by neighbouring LAs and the need to help address the problem.

Liaison with the Community

SOC have long been involved (since 2003) with informing the public about the Local Plan and with helping residents submit representations to the draft IBC Local Plan.

However, it is our view that with the current use and interpretation of the **NPPF** one could gain the impression that the NPPF takes precedence over **the 2004 Statute** and subsequent upgrades/ Statutory Instruments; there appears a failure to embrace the **2012 Localism Act**; resulting, from the public' perspective, in a failure for a proper mechanism for public and community opinion to be considered, in either local plan decision making or in Planning & Development control.

It would be useful if the inspector would clarify why it appears since the introduction of the 2012 NPPF, decisions made (mainly interpretations referencing compliance with it), increasingly override most if not all other considerations, including Local Policies and local Neighbourhood plans. Effectively, it appears that it is the court system that decides, depending on the weight of resources thrown at it by commercial interests.

It's appears effectively "**planning by attrition**". The Housing and Infrastructure Bill and the proposed revision of the NPPF will additionally compound the problems for both LA and the public and communities alike.

As a consequence of the above, the public have effectively lost all faith in "local decision making" or LA, district and Parish Council's capacity to serve their local communities. The fault appears to lay, not with the LAs, like Ipswich, but with the Government Steer which supports another agenda and allows bias in the system through the current "planning by appeal" situation which subverts local democracy and local planning.

SOCS are *still* engaged, but essentially feel we are essentially wasting our time, as we do not feel we are being listened to in the greater scheme of things; by PINS, the Judicial System or the Department of Communities and Local Government or the Secretary of State. It is a sorry state of affairs.

However, we continue to engage in the process. SOCS, like NFPG and nearly 1000 local residents, have identified serious shortcomings that suggest this CS review to be unsound. Herein lies the dilemma. Withdrawing it would leave a void which would potentially hand over control and decisions to vested interests who we feel will pay inadequate regard to the precious local land

resource of “Best and Most versatile” food producing land.

Local authorities need time and space to plan for local needs without fear or falling foul of the system.

IBC has actively communicated with the community regarding its draft Local Plan and also in the master planning of the IGS and other SPDs. The Council Officers have always been helpful and willing to meet local community organisations to discuss planning aspects. The problem perceived by the many Ipswich residents that have responded to these consultations is that the Council as an organisation ‘**Listens but Ignores**’. This is evident from the recent Local Plan Regulation 18 consultation where many residents raised several valid key issues along with constructive recommendations to improve the Plan, but these were simply ignored. Engagement is rather more than a one-way communication.

The master planning of the IGS was via a Community Steering Panel, which seemed to work well but this was prematurely ‘put on ice’ by IBC and discussion guillotined despite requests from the residents community groups to keep it operational. The IGS SPD is not as yet an IBC adopted document and **several potential show stoppers remain**, namely the forecast severe impact on traffic, air quality, lack of strategic sewage infrastructure, drainage solutions and network rail issues. The community groups are keenly interested in these topics, wish to be engaged and although Council Officers are happy to provide updates the impact of the Community Steering Panel is missing. The current inadequate SA SEA undermines all the work and comment offered by local communities.

1.4 Does the plan provide effective outcomes in terms of cross boundary issues? In particular, is the approach of policies CS2 and CS7 that 3,378 dwellings will be provided for by working with neighbouring local authorities later in the plan period (in line with policy CS6) soundly based and in accordance with national policy?⁸ Is there sufficient certainty that these housing needs will be provided for? If you consider that the plan is not sound in this respect could it be modified to make it so?

Although it might seem obvious from the first question, we would like to seek clarification from the Inspector whether the CS should contain matters of a cross-boundary strategic nature including housing, jobs and infrastructure? If so, should the Ipswich CS (and also the draft joint Babergh and Mid Suffolk CS) refer to the Strategic acquisition by IBC of the old Sugar Beet factory located in Babergh and its impact upon employment and housing growth? How does this acquisition fit with IBC’s stated focus on delivering new jobs in the town centre?

Table 3 of the draft CS shows 3778 (not 3378 as in the question) dwellings to be provided by working with neighbouring LAs. This figure will need to be adjusted according to whether a 5% or 20% buffer needs to be assigned to the IBC Objectively Assessed Housing Need. At present the figure can only be considered aspirational since it is not contained in any neighbouring LAs Local Plans. A figure of 2000 is mentioned in the draft joint Local Plan of Babergh & Mid Suffolk, (approximately half of the above) but it points out that work is due to start in 2016 (implying little has been done to date) and there is little mention in IPA minutes with no published agreed objective, plans or commitments.

Without any written commitment from the neighbouring LAs there is **no certainty** that the additional housing needs will be met.

In our opinion submission of the IBC draft CS is premature and time needs to be allowed for the

⁸ We suggest a failure under the **Localism Act 2011, and the (Planning & Compulsory Purchase Act 2004)- Section 33A and Section 20(5)(c)** which places this duty on Local Authorities in the preparation of Local Plans. Failure to demonstrate this is will suggest the plan to be unsound, potentially unlawful and open to challenge at Judicial Review.

IPA to examine the forecast IBC un-met housing needs (including over the next 5 years) to scope and agree the problem, enter into an agreement to jointly work together to resolve the problem and to produce/agree a project plan to identify and evaluate potential solutions. This is not rocket science but just the initiation phase of a joint project, which need not take a long time (say 6-12 months) but needs the commitment and sign-off of each of the LAs. This will provide a better degree of certainty but until viable and agreeable solutions have been identified and 'work packages' decomposed down to and owned by each LA the delivery will have little certainty. These activities need to be written into Local Plans as and when they are revised.

We have seen no evidence of effective outcomes on the cross-boundary cumulative effects of traffic nor where new jobs will be delivered in relation to where new homes will be built.

Matter 2 – Objectively Assessed Needs for Housing and Employment Land

2.1 Is the identified objectively-assessed need (OAN) for housing of 13,550 new dwellings (an average of 677 per year), as set out in policy CS7, soundly based and supported by robust and credible evidence? In particular: (a) Does the OAN take appropriate account of the 2012-based CLG Household Projections? (b) Does the OAN appropriately consider the likelihood of past trends in migration and household formation continuing in the future? (c) Does the OAN take appropriate account of 'market signals'? (d) Is the OAN appropriately aligned with forecasts for jobs growth? (e) Does the OAN take appropriate account of the need to ensure that the identified requirement for affordable housing is delivered?

We support the efforts that the Council has made in using existing models and forecasts and in commissioning the Research and Geospatial Information team of Luton Borough Council to produce Population and Household projections for Ipswich and the surrounding LAs. However, the forecasts are not based on the most up to date evidence and heavily rely on past trends. Between 1991 and 2001 the population of Ipswich slightly declined but between 2001 and 2011 the population expanded by 16.5k, possibly driven by the Ipswich Waterfront property boom. Note that this population expansion was not accompanied by jobs growth within Ipswich (EEFM 2014 data⁹ shows workplace jobs in Ipswich as 65.9k in 1991, 65.9k in 2001 and 65.4k in 2011). We note that historic new build rates in Ipswich are considerably lower than the proposed target with a noticeable spike in completions in 2006-9 many of which currently remained vacant with a number of units being left unfitted. There is no justification that the proposed rates are achievable.

One significant factor in the population growth was migration (both internal & immigration) but since 2011 this has been negative – see the table in 'b' below. For Ipswich's CS to be sustainable there has to be a balance between population and jobs since people tend to migrate to where the jobs are. We have not seen any evidence that the high level of jobs growth forecast in Ipswich Borough by the EEFM is credible and as a consequence the robustness of the Ipswich population growth forecasts must also be questionable.

⁹ Autumn 2014 baseline forecasts published 8th January 2015 <http://www.cambridgeshireinsight.org.uk/EEFM>

(a) The OAN does not take account of the 2012-based DCLG Household Projections, which was published in March 2015. The OAN is based on a September 2013 publication and has not been revised with the latest evidence. The DCLG 2012 outputs forecast a demand for new homes of 10,434 in 2031, which is 3116 below the IBC target of 13,550.

(b) The OAN is based on a 5 year average of ONS migration data for Ipswich up to mid-year 2011 giving an average of at 404/year and this has been used over the 2011-2031 period. Contrast this with the latest ONS forecast¹⁰ that give a 5 year average net migration of just 18 per year, i.e. a difference of 386 per year. **If the latest 5 year period for net migration was used this one effect would result in a reduction in the population forecast of 7720 over the 20 year period equivalent to a reduction in the OAN homes of 3327 at an average household of 2.32 people.**

Mid Year	Population	net migration	
		net internal	net international
2010	131729	513	473
2011	133729	416	34
2012	134466	283	-473
2013	134701	-517	-80
2014	134966	-460	-100
5 Year Average		47	-29.2
Net Migration 5 year average		18 per year	

(c) No Comment

(d) The OAN is aligned with forecast jobs growth (showing a small decrease in the residence employment per household from 1.1 in 2011 to 1.0 in 2031). However, the key driver for jobs growth in Ipswich is linked to local population growth such as retail, rather than national or international products & services. IBC bases its jobs forecasts on the EEFM, the latest forecast being 8th January 2015. Worryingly, the EEFM 2015 forecasts a significantly larger population in 2031 of 162.8k compared to the latest ONS projection of 152k and the Trend Migration Scenario of 154.7k adopted by IBC in the CS. This difference of 8.8k– 11.5k is substantial. Using a much higher population forecast to estimate the number of jobs than that used to estimate new homes growth is fundamentally flawed and hence the CS is unsound.

(e) We note that CS 12 states *'This will be achieved by requiring new development at the Ipswich Garden Suburb to provide for at least 35% on-site affordable housing by total floor space.* However, Para 4.2 of the IBC response to the Ipswich Viability Report produced by Peter Brett & Associates in December 2014 states *'The indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure'*. Clearly it is unsound to set a target of 35% when the viability report indicates 28%. We understand that the IGS infrastructure costs were developed mainly in the summer of 2013. Recently IBC have engaged Mott MacDonald to investigate the IGS infrastructure viability, phasing and costs. We understand that the studies indicate infrastructure costs have risen particularly school costs and network rail costs. IBC should revise the CS affordable housing targets using the latest evidence on viability.

2.2 Is the plan clear as to the identified need for additional pitches for gypsies and travellers (policy CS11) and is the identified need soundly based and supported by robust and

¹⁰ ONS Population estimates and components of population change detailed time series 2001-2014 Released in June 2015.

credible evidence?

No comment

2.3 The soundness of proposals for the Ipswich Garden Suburb and the land allocations for housing set out in policy SP2 (and the case for 'omission sites') will be considered at Stage 2 of the Examination. However, on the basis of the plan as submitted, is it realistic that they would provide for: (a) A supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption? (b) A supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption? If you contend that the plan would not provide for either (a) or (b) above (or both) could it be appropriately modified to address this?

- (a) The latest IBC Authority Monitoring Report¹¹ shows a 2.76 years supply as measured against the adopted CS target of 700 dwellings per annum (dpa) with a 5% imposed buffer. This equates to a shortfall of 2000 dwellings over the next 5-year period. The CS revised target of 677dpa should slightly improve the situation. Our view, as explained above, is that the housing targets are unrealistically high for Ipswich. If the latest ONS migration data and DCLG household projection data was used the OAN would be significantly reduced. Also the jobs growth forecasts for Ipswich appear unrealistic as evidenced by the Peter Brett viability studies and that they are based on a significantly higher population than used to derive the OAN.
- (b) The 6-10 year housing supply is dependent upon the development of the IGS. Without the provision of a northern relief road/ bypass the negative environmental impacts, specifically the severe impact on traffic and associated air quality issues, might outweigh the benefits of the additional housing. The viability might further be challenged by an escalation of infrastructure costs associated with transport mitigation measures and wastewater infrastructure, particularly should a new separate sewer-waste water system and pipeline, compliant with current legislation, be required across Ipswich to the Sewage Treatment Works prove necessary. An EIA of this new infrastructure would be needed on the impacts on the town centre.

One reasonable alternative would be for IBC, as a matter of urgency, to initiate a project with neighbouring Local Authorities to investigate how through closer cooperation the potential un-met demand can be satisfied. This needs to be done to satisfy the unmet demand of circa 4000 homes from 2025 so it would make sense to start the process now and include the 5 year and 6-10 year periods.

2.4 The soundness of individual employment sites set out in policies CS13 and SP5 will be considered at Stage 2 of the Examination. However, on the basis of the plan as submitted, is policy CS13's aim of encouraging the provision of approximately 12,500 jobs soundly based and supported by robust and credible evidence?

It is a fine aspiration based upon the August 2014 EEFM model run published in January 2015. The model was developed by Oxford Economics, is managed by Cambridge Insight and has an excellent pedigree. It is therefore reasonable for IBC to adopt this model for forecasting jobs. The model projects economic, demographic and housing trends, however, 'EEFM forecasts are based on observed past trends only'¹². Also 'The forecasts are unconstrained. This means that the

¹¹ IBC Authority Monitoring report 11 2014/15 issued December 2015

¹² EEFM Technical report January 2015

forecast numbers do not take into account any policy or other constraints that might prevent their actual realisation on the ground.'

The models do not take into account the viability of developing the employment accommodation growth required to facilitate the jobs growth **but IBC should**. Specifically they take no account of the Peter Brett study¹³ into the viability of the Ipswich Development Plan which calls into question the viability of developing new offices, industrial units and warehousing and large retail units in Ipswich. Para 8.3.2 states "none of the office development scenarios are viable" and Para 8.5.1 "industrial and warehouse development in Ipswich is not viable". We note that the EEFM 2015 data shows that to meet the forecast employment growth office floor space will need to increase by 36% i.e. by 94,165 sq m (i.e. over 1M sq ft which equates to accommodation for approximately 7,850 people). It also shows warehouse floor space will need to grow by 17,103 sq m but forecasts industrial floor area will contract by 18,560 sq m.

An analysis of the EEFM jobs categories and growth data indicates that the key driver for jobs growth in Ipswich is simply linked to local population growth such as retail, rather than national or international products & services. Worryingly, the EEFM 2015 forecasts a significantly larger population in 2031 of 162.8k compared to the latest ONS projection of 152k and the Trend Migration Scenario of 154.7k adopted by IBC in the CS. This difference of 8.8k– 11.5k is substantial. Using a much higher population forecast to estimate the number of jobs than that used to estimate new homes growth is fundamentally flawed.

We welcome the new Enterprise Zones being created in and around Ipswich and the impact of these should be examined in terms of the number and location of new jobs.

We have seen no evidence of the net number of new jobs being created in the Borough and the town centre in recent years under the current CS. This evidence also needs to be used in justifying that the new employment target for the CS is sound.

The credibility and robustness of the jobs evidence is undermined by doubts raised over the employment accommodation growth requirements, coupled with substantially different populations being assumed in the jobs growth forecast compared with that for the household OAN. This fundamental inconsistency was pointed out to IBC in our March 2015 representations but has not been addressed.

Save Our County Spaces

Barbara Robinson 03/02/16

¹³ Viability Testing for the Ipswich Development Plan, Peter Brett Associates December 2014