

## **Ipswich Local Plan Review Examination - November 2020**

### **Position Statement**

#### **Of The Ravenswood Environmental Group**

### **Matter 1 - Duty to Co-operate and Legal Compliance**

#### **Issue 1a: Whether the Council has complied with the Duty to Co-operate1 (DtC) in preparing the ILPR?**

#### **Introduction**

- 1.1 The Ravenswood Environmental Group (TREG) speaks for residents and interested parties opposed to the Local Plan Review on planning and environmental grounds. It is considered that the Local Plan should not be adopted and is not sound. The plan may be improved but the changes required would indicate that a new plan and a new approach is required to plan properly for growth infrastructure and environmental protection.
- 1.2 TREG is concerned that the Local Plan proposes a piecemeal collection of poorly presented proposals for the Ravenswood Neighbourhood which the Council has intentionally and repeatedly separated and concealed in this badly structured illegible plan. These very obvious criticisms of the structure content of the Local Plan have been ignored in previous consultations.
- 1.3 TREG has formulated its objections on the lack of cooperation, lack of justification and poor presentation of the plan AND thereafter has criticised the plans proposals for the Ravenswood Neighbourhood.
- 1.4 The main "allocation" part of the plan is the snappily titled IPSWICH BOROUGH COUNCIL LOCAL PLAN SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT. Hidden within this document and its appendices are the Ravenswood Neighbourhood proposals to which TREG objects:

Policy SP1 The protection of allocated sites		Page 16
Policy SP3 Land with planning permission		Page 30
IP150a "Ravenswood U, V, W" – 94 Dwellings-	Table 2	Page 31
Policy SP2 Land allocated for housing		Page 17
IP150d "Land South of Ravenswood Sports Park" – 34 dwellings		Page 26
IP150e "Land south of Ravenswood (excluding area fronting Nacton Road) – to be master planned" – 126 dwellings		Page 26
Policy SP5 Land Allocated for Employment Use		Page 37

IP150c "Land south of Ravenswood" - B1 (excluding office use B1a) and appropriate employment-generating sui generis uses - Table 3 Page 38

IP152 "Airport Farm Kennels" - B1 (excluding office use B1a), B2 or B8 – Table 3 Page 39

Policy SP7 Land Allocated for Leisure Uses Page 43

IP150b "Land at Ravenswood" –Sports Park- Table 5 Page 43

Policy SP8 Orwell Country Park Extension Page 45

Appendix 3 Site Sheets Page 112

- 1.5 Thus, 11 policy proposals, statements and allocations for Ravenswood totalling 30,000 sqm of industry, warehousing and sui generis uses plus a minimum of 254 new dwellings and a vague Sports Park are sprinkled throughout 11 separate pages of the plan without once highlighting that 5 of these allocated sites share common boundaries one with another. These geographically conjoined sites are IP150b, IP150c, IP150d, IP150e and IP152. They are "literally" divorced by this poorly presented plan. In addition, there is site IP150a (U,V,W) which is shown erroneously as benefiting from outline planning permission notwithstanding the fact that the last planning application for that site was submitted in 2007. Finally, the Orwell Country Park extension (IP149) is proffered as a ploy to reduce visitor pressure on the SPA when the preceding 6 sites do exactly the opposite.
- 1.6 TREG is concerned at the absence of comprehensive masterplanned approach to Ravenswood. The extent of development clearly impacts negatively on the SPA and the Sports Park is at the boundary with a designated Local Wildlife Site. We also consider that a comprehensive overview of Ecological and other Environmental Impacts is required now along with a masterplanned new access to the Nacton Road to ease congestion and improve Air Quality. The Appendices to the plan merely hint that a new access could be required and hint at masterplanning but only in the least certain terms. Paragraphs 4.10 and 4.11 of the supporting text serve only to highlight the lack of evidence behind the policy content.
- 1.7 Paragraph 16(d) of the NPPF states that Local Plans "should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Given the fact that the Borough Council owns a number of sites it is of grave concern that the planning policy here is so poorly presented that the Council does not understand its own policy. This obvious criticism has become crystallised in recent weeks with the Council's housing company submitting a planning application for site IP150a which fails to comply with the emerging local plan, the old local plan, national planning policy or the opinion expressed in the recovered decision which previously refused the proposal.

## **Duty to Co-operate**

*1. How has the Council engaged constructively, actively and on an ongoing basis with all of the relevant authorities and prescribed bodies on the 'strategic matters' applicable to the ILPR?*

- 1.8 The plan fails to meet even the base principles of the Duty to Co-operate. There is a public perception that the Borough Council is completely out of step with its 3 neighbouring Districts with which it shares a close geographical association but a very distant political ideology. The Borough had initially shared its Review timetable with East Suffolk but the Suffolk Coastal Local Plan was adopted in September 2020 and that Examination heard much criticism of the complete absence of co-operation between the two Councils. At that earlier examination it was laughable that the only co-operation between the Councils was a short Statement of Common Ground to say that they were co-operating.
- 1.9 Each urban growth centre within the Eastern Region has a beneficial joint plan which coordinates urban growth and rural planning. There is Greater Norwich (where Norwich City, Broadland and South Norfolk co-operate) and Greater Cambridge (where South Cambridgeshire and Cambridge City co-operate) but there is no Greater Ipswich to deliver a modern effective legible and useful plan for the County Town of Suffolk and its rural setting.
- 1.10 Without a comprehensive cross border approach to planning in a locality which is not self-contained and cannot manage or mitigate its own growth requirements, this plan cannot be sound or effective.
- 1.11 The most worrying failings of the plan are its lack of evidence based justification and its lack of legibility. This means that policies are poorly justified. Policy Writers have no idea of the environmental, traffic and ecological impacts of their policies and Decision Makers are presented with vague policies which make for indecision. Planning should be plan led. However, the future for Ipswich looks alarming with Planning Officials telling their population that this or that proposal must be approved because it is in the plan yet the plan making process has provided none of the evidence to support future planning applications.

## **Habitats Regulations Assessment**

*9. Is the ILPR legally compliant with respect to the Habitats Regulations and Habitats Directive, as interpreted by recent case law, and any requirement for appropriate assessment? Do the Habitats Regulations Assessment (HRA), January 2020 (A6) and HRA Addendum, May 2020 (A7) ensure compliance? Are*

*further main modifications to the ILPR necessary to ensure it would not have any likely significant impacts in the light of the HRA?*

- 1.12 The wording of the policies of the plan predate the HRA regulatory requirements as there is clearly very little change in the plan from the Public Consultation Draft. The vast development proposed at Ravenswood amounting to hundreds of homes, significant increases in traffic, deterioration in air quality, erosion of natural habitat and increased proximity to and pressure on European protected sites has not been stress tested in the context of HRA.
- 1.13 The wording of the plan in conjunction with the Orwell Country Park Extension at site IP149 serves to illustrate the fact that the HRA is retrofitted to justify the unchanged text of the plan.