

SOCS Response to IBC POLICY CS10 Statement on IGS -30th August 2016

SOCS find the statement and conclusion issued by IBC in July above to be unacceptable and fails to address the key concerns on Sustainability raised in our submissions and expressed on the 18th and 22nd July at the Inquiry in public.

It is SOCS (and NFPG's) view that the issue of "multiple starts" phasing has never been addressed through the SA and SEA work since the proposal "emerged" in 2013.

It is our belief that failure to assess this approach through formal SA and SEA work could render this Core Strategy Review unsound and it could be considered to be non-compliant with the NPPF Steer on Sustainable Development.

1.2 Legal Requirements for Sustainability Appraisal (incorporating SEA)

1.2.1 The SEA Directive has meant that, since July 2004, the UK has been required to carry out SEA on those plans and programmes that are thought to have a significant effect upon the environment.

1.2.2 The UK Government is addressing the SEA Directive through the enhancement of SA, which not only assesses economic and social impacts of plans and programmes but also gives greater emphasis to the environmental impacts. SA is part of the UK Government's steps towards addressing sustainable development as set out in the Brundtland Report "*Our Common Future*" (1987).

From 21/08/13

(NFPG) together with SOCS Comments on the Ipswich Garden Suburb Supplementary Planning Document suggestions SOCS Sustainability Appraisal and Strategic Environmental Assessment Report by Hyder

SOCS are pleased there is now an acknowledgement, that, beyond doubt, this is governed by EU Directive.

Omissions from the report

Multiple Starts

From the draft SPD (Figs 48 – 52) a multiple start sequencing of the development appears under consideration (subject to the outcome of the Core Strategy Review) yet the Sustainability Appraisal report completely fails to consider the impact of this. It is important the two documents are consistent and this is a major failing, especially as the previous Suffolk County Council Northern Fringe Sustainability Appraisal post CS Examination – 3.6ET51- warns against multiple starts and the Core Strategy independent Inspection judged multiple starts as unsustainable.

Paragraphs 4.8.2, 4.8.3 and 4.8.6 of the main report and Section 5.7 of the Summary document clearly assume that initial dwellings will only be delivered in Fonnereau Village, which is not what is being proposed.

As a minimum, an appraisal of the impacts of the illustrative sequencing (Figure 48 - 52 of the draft SPD) should be undertaken, even though it is "aspirational" and referencing of the 2006/2011 SA/SEA comments that multiple starts are in themselves unsustainable.

Until this SA considers the potential impacts of this in the report and states that the 2006 and 2011 post Inspection SA work which underpins this Report findings, this report is not ready for presentation to the IBC Executive or consultation and should not be released.

Multiple Starts

The suggestions of “multiple starts” is complete at odds with the adopted CS and has been identified to be totally unsustainable.

The "Sustainability Appraisal (incorporating Strategic Environmental Assessment) of Submission Core Strategy and Policies (As amended following the IBC Core Strategy Examination May/July 2011) For Ipswich Borough Council Update July 2011"

http://www.ipswich.gov.uk/downloads/SA_report_inc_appendices_July_2011_Final.pdf

States that multiple starts should not be allowed in paragraphs 1.1 and 5.

Therefore our argument is that the CS has a requirement for developments to be sustainable.

Multiple starts have been identified as unsustainable therefore will be in breach of the Core Strategy.

The 2006 Scoping Report for the SA outlined that potential adverse impacts must not only be identified but also monitored (over time) but also emerging impacts must be capable of being mitigated where necessary.

Monitoring measures	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the appraisal.	
Proposals are made for action in response to significant adverse effects.	
Monitoring enables unforeseen adverse effects to be identified at an early stage. These effects should include predictions that prove to be incorrect.	
During implementation of the plan, monitoring is used where appropriate to make good deficiencies in baseline information in the appraisal.	

The 2006 Scoping Report for the SA identifies Baseline data requirements;

2.2.2 Full tables of the relevant baseline data have been included in Appendix B. The baseline data has been split into agreed theme areas. The baseline data covers the groups defined within SEA guidance:

- climate change;
- soil and mineral resources;
- local air quality;
- water resources and quality;
- built and historic environment;
- natural environment and biodiversity;
- landscape;
- economic performance and diversity;
- transport;
- equity and employment;
- human population and health;
- skills and education.

However, the baseline data in Appendix B is presented by themes identified through the *One-Ipswich Community Plan*. This facilitates an easier relationship to other documents and strategies in the local area.

The following Key issues and challenges were outlined.

Table 7: Key Issues and Challenges for Sustainable Development in Ipswich

Key Issues & Challenges
Social: <input type="checkbox"/> Higher than average mortality due to respiratory disease. <input type="checkbox"/> Number of homeless increasing year-on-year. <input type="checkbox"/> Lack of suitable affordable housing (by type) available. <input type="checkbox"/> Requirement for 15,400 new dwellings in the Borough by 2021. <input type="checkbox"/> Ageing population
Environmental: <input type="checkbox"/> Rising volume of traffic <input type="checkbox"/> Flood risk along River Orwell Corridor <input type="checkbox"/> Increasing number of fatalities in road traffic accidents. <input type="checkbox"/> Need for renewable forms of energy in new homes.
Economic: <input type="checkbox"/> Need to enhance and sustain the viability and vitality of the town centre and local centres. <input type="checkbox"/> Need for suitable employment land (by use) and encourage increasing new business development. <input type="checkbox"/> Need for more retail floorspace. <input type="checkbox"/> Requirement for 18,000 new jobs in the Borough by 2021. <input type="checkbox"/> Decrease in manufacturing employment. <input type="checkbox"/> Increase in office-based employment

Key Health & Well Being issues for Ipswich were identified which included reduced life expectancy issues and respiratory problems, not entirely explained by a key Public Health Study by the Director of Public Health, Dr. Brian Keeble.

Health & Well Being

- 2.4.8 The overall death rate in Ipswich (per 100,000 population) in 2003 was 645.0. This was significantly above the Suffolk average of 609.6. This figure is down on the previous year but still remains high for Suffolk.
- 2.4.9 The average life expectancy for men in Ipswich is 76.6 years and for women it is 81.3 years.

IBC have a legal duty to provide some degree of certainty that proposed expansion and development should be Sustainable and should not not exacerbate these known problems.

It requires an appropriate balance between risks and benefits and deliver a better Quality of Life for every one, now and in the future. SOCS feel that balance has not been achieved by multiple start phasing.

1.3 Sustainability Appraisal and the Local Development Framework

- 1.3.1 The SA process will identify the likely significant effects of a plan's policies and proposals. It will assess the extent to which implementation of a plan will achieve social, economic and environmental objectives related to sustainable development.
- 1.3.2 Sustainable development is about getting an appropriate balance between the following:
 - Maintenance of high and stable levels of economic growth and employment;
 - Social progress which recognises the needs of everyone; and
 - Prudent use of natural resources.
- 1.3.3 In essence, sustainable development is about ensuring a better quality of life for everyone now and for future generations.

Westerfield Station “Improvements”

References to “Multi starts”/ phasing by IBC in relation to possible improvements of service to be gained for Westerfield Station (and Network Rail’s interest), are questionable.

The increase of dock traffic will take precedence over passenger services for two reasons; economic and health.

Increase use of rail over freight is necessary to avert Air Pollution (LAQMA) impacts at Gate 1 Felixstowe.

Services have been badly affected and deteriorated for passenger services over the past 2-3 years. This is likely to be the case for the foreseeable future.

Coordinated Infrastructure delivery could be achieved using Grampian Conditions.

The IGS phasing suggested is unlikely to positively affect job growth stagnation or attract new business in SOCS view.

Multi starts will cause an acceleration of traffic related and health problems where as a phased, one site at a time start, will give time for adjustment, mitigation or halt if mitigation is not possible.

Health Impact Assessment

Whilst the incorporation within a validation list is welcome, this does not preclude the need for an **independent Health Impact Assessment which we say is essential.**

As evaluation of adverse impacts will depend on Traffic “projections and estimations” submitted by the developers whose methodology, data and interpretation of data is currently contested by residents and others. Developers should not be both judge and jury. There is a conflict of interest here. As Ipswich has a serious and significant Air Quality long term problem.

Proposals to remove free flowing roundabouts and replace with traffic lights, plus add further Toucan crossings, will further add to delay, congestion and air pollution impacts. Similarly, the removal of verges and separation to increase traffic volume and flow will cause identified air pollution at junctions to have an increased health air pollution risk to neighbouring residents.

Finally, the IBC Consultant report by WSP on Air Quality possible impacts, which relies on a “generalised” not specific Ipswich based assessment, is totally unacceptable and effectively meaningless in our view and in the view of experts we have approached.

It is at odds with the process outlined in the above referenced Scoping, SA and SEA document which, a decade on, should underpin the entire Sustainability and Soundness of this Core Strategy review.

Felicia Blake

From: Barbara Robinson
Sent: 30 August 2016 17:03
To: Annette Feeney
Subject: Response from SOCS to Planning Inspector

Re following, SOCS support and sign up to the detailed responses submitted by NFPG, Rod Brooks and Brian Samuel.

Whilst we are please to see Health Impacts on the IBC Validation list with respect to planning Applications, SOCS have little confidence that this will address the concerns raised on the 18th and 22nd July.

In addition, SOCS are disappointed as are NFPG that concerns have failed to be alayed by the recent further information.

See notes attached. regards, Barbara Robinson on behalf of SOCS.

1. IGS

-Matter 5: IGS SOCG between IBC, CBRE, Crest Nicholson and Mersea Homes (1 August 2016)

-Appendix to the above SOCG

-POLICY CS10 – IGS STATEMENT on Phasing and Health Impact Assessment Issues – August 2016

2. Transport/Air Quality

-Letter from Barton Willmore of 20 July 2016 (IGS Transport Summary Note) – PSCD33

-A summary of the overview of the processes, methodology and data sources used to produce the NTEM 6.2 planning data set – PSCD37

-NTEM Planning DataVersion 6.2 Guidance Note (Dept for Transport) – PSCD34

-Deriving Background Concentrations of NOx and NO2 (Air Quality Consultants) – PSCD36

3. -Council produced a note based on the 2014 Household Projections