

Barbara Robinson Save Our Country Spaces (Blue text with key issues relating to SOCS earlier representations) together with Representor: Brian Samuel, NFPG in black text)

Matter 1 - Duty to Co-operate and Legal Compliance (SOCS Attending) Rep 26343/ 26347

SCI and Consultation 7. Has consultation on the ILPR been undertaken in accordance with the Council's adopted Statement of Community Involvement and the minimum consultation requirements in the Regulations? What evidence is there that representations submitted in response to the Draft Local Plan have been taken into account as required by Regulation 18(3)?

It is clear that the plan as drafted indicates further departure from the Bruntland Principle. The public have little confidence in the Planning System and the NPPF which is undemocratic and swayed towards business, and is intent on just shifting identified problems into the courts and onto someone else's patch!

Significant changes were made to the original draft CS and DDD plan, which had previously been publicly consulted on, within last January's submission; changes which we were only allowed to comment on in terms of 'soundness', 'legality' etc. SOCS and Tuddenham PC suggested this to be a Breach of the SCI rendering plan unsound.

Errors in the process, mistakes in the draft could not be rectified or the plan altered.

Thus I draw attention to the following advice given by IBC to one landowner with site -IP367 Land west of Humber Doucy Lane Housing 7 0.33 11-15 - specified in the SHELAA (January 2020).

From: @ipswich.gov.uk>
Date: 9 April 2020 at 15:24:54 BST
To: T
Subject: RE: Ipswich Local Plan site ref IP367

Dear

Apologies that it has taken me a little while to come back to you on this. Thank you for the information, we'll keep your details on record.

I hope you have an enjoyable Easter weekend.

Kind regards

Planning Policy Officer
Tel: 01473 432911
Email:
www.ipswich.gov.uk
www.facebook.com/IpswichGov
twitter.com/IpswichGov
Coronavirus - protect yourself and others
www.nhs.uk/coronavirus

Sent: 29 March 2020 17:38
To:
Subject: Re: Ipswich Local Plan site ref IP367

Good Afternoon

As requested here are the contact details and Ordnance Survey Map grid reference with photos outlining our property which is owned by

Stepping Stones for Biodiversity

The land in question is at Humber Doucy Lane Ipswich IP4 3QG OS Grid Ref TM18237 46989

image001.png image002.png

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Chairman of trustees for "Steppingstones for Biodiversity"
Registered Charity No 1153062

Phone No
e-mail address
Many thanks,
Best regards,

On 19 Mar 2020, at 19:42, A

wrote:

Dear

Thank you for this information, would it be possible to provide an OS map / the title map, showing the area of land now in your ownership, this would help with our records. If you could also provide any additional contact details, such as an address or contact number this would be useful in terms of future correspondence, though on the whole the Council communicate electronically. I could also add you to our Local Plan consultation database, which would ensure you're kept up-to-date on planning matters in Ipswich, but I would need your permission to do this. If you would like to be added to the database please let me know.

With regard to development surrounding the plot, the Council has recently consulted on its Final Draft Ipswich Local Plan and you may have seen that an area of land along the northern end of Humber-Doucy Lane is allocated as a strategic house site, plus associated infrastructure. At this stage in the plan making process we aren't accepting further comment on this site allocation, but if this changes we will let those on the consultation database know. The plan also contains policies on protection of biodiversity which maybe of interest.

Ipswich local plan final draft consultation - <https://www.ipswich.gov.uk/content/ipswich-local-plan-review-final-draft-consultation>

Site allocations, please see ISPA 4.1 (Humber Doucy Lane) towards the end of this document - https://www.ipswich.gov.uk/sites/default/files/ilp_reg_19_site_sheets_ip080_-_ispa_4_1_part_2_clean.pdf

Look forward to hearing from you.

Kind regards

Planning Policy Officer
Tel: 01473 432911
Email:
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www.facebook.com/IpswichGov
twitter.com/IpswichGov

Sent: 18 March 2020 22:57

To:

Subject: Re: Ipswich Local Plan site ref IP367

Dear

Many thanks for getting back to me.
I have now signed the documents for ownership of this plot of land on Humber Doucy Lane. The confirmation title No from the Land Registry is SK 400494. This will be owned by my charity called Steppingstones for Biodiversity registered at my address of
I would be very grateful for any forward plans or information that would be of concern regarding this plot of land.

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many thanks,
Best regards,

Chairman of trustees for Steppingstones for Biodiversity.
On 18 Mar 2020, at 17:48,

Dear Sir,

I understand that you contacted my colleague Kisha with regard to Ipswich Local Plan site IP367. Could you confirm whether you have purchased the site, or are in the process of doing so.

Unfortunately it is too late to update the plan at this stage in the process, there maybe the opportunity to do so at a later date possibly towards the end of the year. However, if you have purchased the site, we would be happy to keep your details on file, so that we can discuss your future plans for the land and engage with you further on local plan matters.

Look forward to hearing from you.

Kind regards

Planning Policy Officer

Tel: 01473 432911

Email:

www.ipswich.gov.uk

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From:

Sent: 16 March 2020 16:06

To:

Subject: tel msg

This is the gentleman who wants to buy part of site ref IP367 he said it's listed as owner unknown and wants to know if he can still register as a land owner for the final publication of the document?

His email is

Business Support Officer

T: +44 (0)1473 432904

E: I

Grafton House, 15-17 Russell Road, Ipswich, IP1 2DE

www.ipswich.gov.uk

www.facebook.com/IpswichGov

twitter.com/IpswichGov

The above dialogue is significant as it appears that the site should not have met IBC inclusion criteria. The site is in a significant position which may be material to plans for Humber Doucy lane as an area for extension for the IGS in terms of access, availability and status of the site, which is currently stalled with the Land Registry following probate. Legal opinion will need to be sought to see if IBC changes are lawful.

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Representation 26494 (and from IBC's review of the summaries of our Representations and IBCs proposed main modifications)

We are concerned that the final draft of the Plan and the proposed modifications representations fails to adequately reflect our issues and concerns, especially in relation to traffic, air quality, modal shift, and infrastructure delivery but also town centre retail space. This has been a common theme for many years on the numerous Local Plan and other IBC consultations on these issues. Over the past decade, IBC has clearly failed to improve air quality or to achieve noticeable modal shift changes having taken insufficient action to deliver real projects and new infrastructure, yet it continues to generally ignore our protestations and informed consultation responses. If IBC had reflected our concerns and acted upon them, it would be in a far stronger position to deliver the Plan and Ipswich would be a much better place for it. Yet again, IBC has ignored our requests to specify the infrastructure in the Plan that is required to prevent unacceptable congestion, deliver high modal shift levels, and meet legal air quality targets and is necessary to make the Plan sound. IBC has still not provided details for the delivery of new infrastructure to achieve the required levels of modal shift.

The recent IBC Air Quality Monitoring Report indicates that work on the IPA Air Quality Action Plan is delayed. No soundness should be assumed until that Report is complete.

Similarly, over the past ten years, IBC has ignored our calls to provide more detail in the Plan on the required foulwater infrastructure in Ipswich without which the proposed growth, and in particular the Ipswich Garden suburb (such as pumping stations and off-line storage), will not be delivered. Inclusion of this infrastructure will clearly help focus minds and facilitate timely delivery. **NB Anglian Water Statement of Common Ground recently)**

Suffolk County Council (Drainage and Highways) have recently objected to reserve matter planning applications due to none compliance with agreed process, So deliverability may present issues.

We are also concerned that the summary of our representations fails to fully reflect our concerns with these issues. Obviously, we recognise that these are "summaries" so will not include all the detail. When considering our submitted Hearing Statements, cross-reference to our detailed consultation response would be more appropriate than to the representation summaries provided in A16 & A17.

Sustainability Appraisal (Health Impact Assessments?? - including appraisal lack of CCG capacity to delivery new primary healthcare facilities- meaning more traffic to be generated to existing Primary care sites- at Two Rivers Took's Bakery site))

Representations 26493, 26496, 26509, 26512, 26525, 26514, 26494, 26513, 26538

8. Has the formulation of the ILPR been based on a sound process of sustainability appraisal (SA), as set out in the SA Report of the Final Draft of the ILPR, dated October 2019 [A4], and the SA Addenda, dated June 2020 [A5] and October 2020 [I13]? In particular:

Does the SA test the Plan against reasonable alternatives, in terms of its overall strategy for growth and development, site allocations and policies?

b. Has the SA been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?

c. Is the SA decision making and scoring robust, justified and transparent?

d. Has the Council provided clear reasons for not selecting reasonable alternatives?

e. Is it clear how the SA has influenced the ILPR strategy, policies and proposals and how mitigation measures have been taken account of?

f. Have the requirements for Strategic Environmental Assessment been met, including in respect of the cumulative impacts of the plan?

The SA fails to identify that the Local Plan will not deliver the infrastructure required to meet transport requirements, deliver modal shift, or improve air quality in a timely manner. Without such infrastructure, along with required delivery dates, being specified in the infrastructure tables there is a major risk that the Plan will not be delivered. We also note that the SA fails to identify that the traffic modelling excludes

construction and trades traffic arising from the new development in the Plan, so will considerably underestimate the impacts on existing infrastructure and the need for new and improved infrastructure. The SA fails to assess the environmental impacts of construction and construction traffic, most notably regarding air quality, and is not robust enough in this respect.

The SA fails to identify that the traffic and air quality modelling assume new road infrastructure will be delivered by 2026, which is earlier than the actual planned delivery dates for some schemes. The outline planning Conditions for the Henley Gate and Fonnereau developments specified by IBC in the Decision Notices have identified trigger points for junction/road improvements, which when cross-referenced with the planned phasing of the Ipswich Garden Suburb (Topic Paper reference I6), show when the road infrastructure is actually planned to be delivered. Delivery of this key infrastructure is mainly due after 2026, later than the delivery dates assumed in the modelling, as shown below.

Trigger Point	Road infrastructure improvements etc	Indicative date from I6 build schedule
Henley Gate		
299 homes	Henley Rd and Dale Hall Rd junctions with Valley Rd	2025/26
600 homes	Westerfield Rd/Valley Rd junction	2027/28
699 homes	IGS Road Bridge	2028/29
Fonnereau		
399 homes	Westerfield Rd/Valley Rd junction	2028
499 homes	Tuddenham Rd/Valley Rd junction	2030

Similarly, the SA fails to identify that other modal shift projects/infrastructure to be funded by IGS Developers, through planning Conditions on the IGS, will also not have been delivered by 2026. However, the traffic and air quality modelling assume such projects will have delivered significant modal shift savings for existing Ipswich residents (as well as for new IGS residents) but clearly this will not be the case.

Consequently, the Plan does not sufficiently address the impacts of growth in the early years on air quality, climate change and health. We also do not believe the SA makes a robust enough assessment on the impact of growth on air quality in the early years of the Plan prior to 2026, before air quality levels should begin to improve through electric vehicle growth and tighter emission standards filtering through the national vehicle fleet. The SA also fails to identify the historic lack of any real progress and action from IBC in improving air quality and delivering modal shift (as evidenced in the latest Authority Monitoring Reports (AMRs) (documents E1 and E2), which clearly identifies a major risk of non-delivery.

The SA consequently fails to identify the over-reliance on modal shift (15% by 2026 assumed in the traffic modelling) to deliver the Plan and the extremely high risk that the required levels will not be achieved. We note that IBC has not yet provided evidence that this 15% change in modal shift by 2026 is achievable and has not provided details of the key modal shift projects and funding sources to deliver it. In our opinion, the Plan can only be found to be sound when this evidence is available.

The SA does not adequately address IBC's non-compliance with legally binding Air Quality targets and IBC's lack of progress in delivering them. The new development proposed in the Plan will clearly add to current illegal levels of air pollution without additional remedial measures. The SA should be identifying these risks and the need for modal shift and air quality reduction targets in the Plan to help focus efforts in achieving the required improvement and recommending the inclusion of them in the Plan. The SA has therefore failed to adequately influence the ILPR strategy, policies and proposals and mitigation measures with respect to increasing modal shift and reducing air pollution.

In our opinion the Council's response to the SA recommendations on cycle and pedestrian routes etc is also insufficient to make the Plan sound. A greater commitment to delivering specific cycling and pedestrian routes that are safe is required from IBC to make the plan sound. IBC has not provided sufficient reasons for not doing so.

We believe that the SA has failed to take into consideration the potential for more homes in the town centre, rather than build on green field land on Humber Doucy Lane.

The Tuddenham Road area in question is partly an accident Black Spot, narrow, derestricted carriageway with cars speeding at 60 mph and camera evidence of some exceeding that speed, up to 90 mph on occasion. Documentary evidence has been sent to Parish Councils and Suffolk Police.

In our opinion, IBC has over-estimated retail space and car parking requirements in the town centre and the Plan is unsound in this respect. Providing new homes on brownfield land is clearly more sustainable than building on green field land. This will also help regenerate the town centre and could help link the Waterfront with the main town centre. Building town centre homes will reduce the need to travel by car, help mitigate congestion and will be less damaging to air quality and the environment. Retaining green field land, will help preserve biodiversity (adding to an established deficit an identified shortfall which has existed since the 1960's_ and creating a further biodiversity open space shortfall- in N and NE Ipswich) and the associated benefits. Building town centre homes, rather than at Humber Doucy Lane, will remove the reliance on the delivery of IGS infrastructure and the need for new road development to deliver the site. (The methodology and outcomes which identify the HDL area in the LP process are flawed and need revisiting)* (see at end of this section) The SA needs to make a proper and robust assessment of this alternative for the Plan to be sound.

Climate Change Policies

Representations 26493, 26507 (and those that reference the need for modal shift as this is a key carbon-reducing policy)

10. Does the ILPR, taken as a whole, include policies designed to ensure that the development and use of land in Ipswich Borough contributes to the mitigation of, and adaptation to, climate change in accordance with Regulations?

Whilst there are policies in place, there is a lack of identified infrastructure projects that will be required to deliver the required levels of modal shift to mitigate climate change. Specific projects that reduce transport carbon emissions need to be identified and included in the infrastructure tables for the Plan to be sound (see our comments on Matter2). The need for this is evidenced by the lack of progress (despite targets in previous Plans) on delivering modal shift (and hence reducing carbon emissions from transport) as reported in the new Authority Monitoring Report, 2018/19 May 2020 (E1).

- Table 9: Ipswich Carbon Emissions (2005-2017) shows just a small decrease in transport carbon emissions of 1.5%.
- Objective 6 Accessibility target - To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031 The assessment of progress against this "The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review" is clearly totally inadequate. We note that the Authority Monitoring Report, 2017/18 June 2019 (E2) contained the same comment.

Health Impact Assessment

Representations 26497, 26525, 26530 (our health impact concerns are related to illegal air quality levels)

11. Is the Health Impact Assessment [A9] of the Plan robust? Does it demonstrate whether the ILPR would have an overall positive effect on health and wellbeing in the Borough? Is any further mitigation of health effects required?

The Covid-19 pandemic has shown that it is even more urgent to improve air quality to meet legal requirements as poor air quality increases respiratory illness. The Local Plan needs to be strengthened to

ensure that new developments do not worsen air quality in and around the existing AQMAs in the early years of the Plan to be sound. The HIA needs to assess whether air quality will be improved sufficiently in the early years of the plan to meet legal limits and prevent damaging health impacts. Specific air quality improvement projects (e.g. new and improved cycle lanes) in and around the existing AQMAs need to be included in the infrastructure tables. The HIA fails to identify that the new development proposed in the Plan will add to current illegal levels of air pollution without additional remedial measures. It is clear the Plan needs to strengthen its commitment to reduce air pollution to below legally binding limits to mitigation the damaging effects on health. Firm targets to reduce air pollution to legally binding limits are required to be included in the Plan for it to be sound. The HIA fails to assess the impacts on air quality of emissions from construction and construction traffic, which will need to be mitigated.

No evaluation has been made of additional air quality burden and noise burdens from Railway lines which run through proposed new development areas and agricultural activity nearby.

*

'1.3 In addition, it does not mean that any site included will be granted planning permission. Therefore, inclusion within the SHELAA document does not provide any planning status on the site but instead highlights site suitability, availability and achievability. Sites will be taken forward and formally considered and consulted upon through the statutory Local Plan process or, where relevant, through the statutory registers required through the Housing & Planning Act 2016, such as the Brownfield Sites Register. This SHELAA document supersedes the previous 2010 and 2013 land availability assessment documents for Ipswich Borough.'

'Availability

(See PPG Paragraph: 019 Reference ID: 3-019-20190722)

2.35A site will be considered available where the landowner/promoter has expressed an intention to develop or sell the site for development and there are no known legal constraints in accordance with Paragraph 67 of the NPPF (2019).

2.36 Evidence has been sought on the ownership of the sites, including Land Registry Title Deeds. Sites with unresolved ownership problems such as multiple ownerships with no agreements, ransom strips, tenancies and covenants will not be considered available unless there is a reasonable prospect these constraints can be overcome.

2.37 For a site to be deliverable there must be confirmation from the landowner or promoter that the site could become available for development in 0-5 years.

2.8 The threshold for consideration of sites in this assessment will be set at land of at least 0.1ha in size or capable of delivering 5 or more dwellings. This threshold does not apply to sites with planning permission for development."

Assessment Findings Sites considered with potential capacity for future development

3.1 The Council undertook a 'call for sites' in the autumn of 2017 as part of the early preparation stage for the new Ipswich Borough Council Local Plan Review. An assessment has been undertaken of these sites using the methodology in Appendix A.

3.3 Based on information supplied to the Borough Council through the call for sites process, liaison with landowners through the SHELAA process, as well as officer judgements, an estimate has been made regarding the delivery timescales of available land for development. This is set out below

SHELAA (January 2020)

Site Ref /Site Address/ Proposed Use/ Number of Dwellings /Area (ha)/ Timescale

IP184a Humber Doucy Lane Housing 213 10.15 11-15

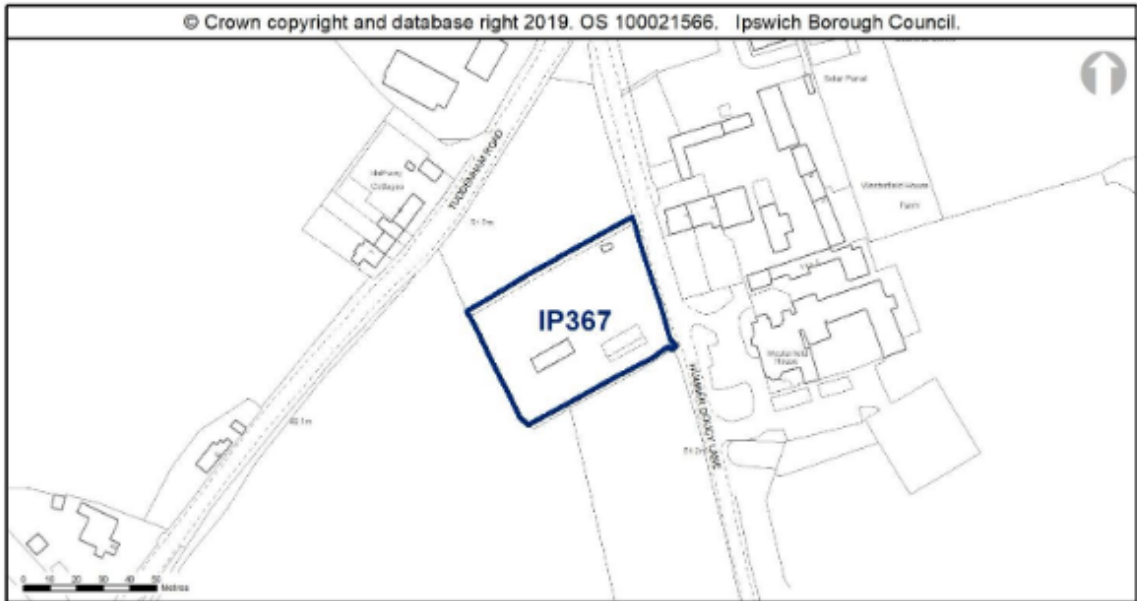
IP184c Humber Doucy Lane Housing 84 4.01 11-15

IP303 Tuddenham Road/Humber Doucy Lane Housing 181 8.62 11-15

IP344 Land fronting Humber Doucy Lane Housing 22 1.02 11-15

IP350 Land at corner of Tuddenham Road and Humber Doucy Lane Housing 8 0.35 11-15

IP367 Land west of Humber Doucy Lane Housing 7 0.33 11-15 (SSfB)



District:	Ipswich Borough Council		
Site Reference:	IP367		
Site Location:	Land west of Humber Doucy Lane		
Approx site area (ha):	0.33	Brownfield / greenfield / mixed use land:	Greenfield
Existing land use:	Vacant land with greenhouse		
Neighbouring land use:	Care Home, residential and agricultural land		

CONSTRAINTS		IMPACTS	
Access to site	Amber	Landscape/townscape	Amber
Access to wider transport networks	Green	Biodiversity and geodiversity	Amber
Access to local services & facilities	Amber	Historic environment	Green
Utilities capacity	Amber	Open space	Green
Utilities infrastructure	Amber	Transport and roads	Amber
Contamination	Green	Compatibility with neighbouring uses	Green
Flood risk	Green		
Market attractiveness	Green		
Proposed land use description:	Residential		
SHELAA site assessment			
Suitability	Site could be suitable for residential subject to access and infrastructure improvements.		
Availability	Site ownership is currently unknown. Could come forward as part of wider strategic allocation in emerging Local Plan.		

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