

Felicia Blake

From: Oliver Holmes
Sent: 02 March 2020 20:46
To: PlanningPolicy
Subject: Ipswich Core Strategy and Policies Development Plan Final Draft Consultation
Attachments: consultation 1.doc; Continuation Sheet 1.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

I enclose my consultation response. Please acknowledge in due course.

Regards,
Oliver Holmes

Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

**Town & Country Planning (Local Planning) (England) Regulations
2012 (Regulations 19)**

Consultation Comments Form



e-mail:
planningpolicy@ipswich.gov.uk

Planning Policy Team
Planning and Development
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE.

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www.ipswich.gov.uk

Consultation document(s) to which this comments form relates:	Core Strategy and Policies Development Plan Document Review – Final Draft
Please return this comments form to:	planningpolicy@ipswich.gov.uk or Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	11.45pm Monday 2nd March 2020
This form has two parts:	Part A – Personal details
	Part B – Your comment(s).

PART A PERSONAL DETAILS		
	1. Personal details	2. Agent's details (if applicable)
Title	Mr	
First name	Oliver	
Last name	Holmes	
Job title (<i>where relevant</i>)	-	
Organisation (<i>where relevant</i>)	Ipswich Liberal Democrats	
Address (Please include post code)		
E-mail		
Telephone No.		

PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (and client if you are an agent):

Oliver Holmes, Ipswich Liberal Democrats

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
CS6.7 The Vision	To be sound, reference needs to be made to the Government's net zero 2050 policy together with reference to IBC's Climate Emergency Declaration July 2019. This needs to be an overarching policy vision over the whole of the Core Strategy. Failure to do so could make the CS unlawful.
CS6.8.4 and 5	Development in itself is unlikely to achieve any reduction in carbon emissions (unless it is a form of carbon sink, for example). The Objective should be re-written so that permitted development will not add to carbon emissions. To be sound, reference also needs to be made to air quality/pollution and the need for development not to add further to poor air quality in existing and potentially new Air Quality Management Areas.
CS6.8.6	Throughout the Draft, reference is made to significant modal shift to achieve sustainability. However, although this policy has been in existence for some years, no evidence is given as to any modal shift having taken place. As modal shift is not occurring under existing policy (almost certainly as a result of both lack of initiatives and disincentives), continued reference to such shift could be seen as disingenuous. The Objective needs to be re-written to provide initiatives and disincentives to developers.
CS6.17	Any development in Humber Doucy Lane must not take place until the Garden Suburb is substantially completed. "Appropriately phased" is too open-ended. To be sound, and to enable completion of the Garden Suburb, no development should occur before a trigger point of 3,200 completed homes.

PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
CS8.18	Although Improved Infrastructure Is stated to be essential for sustainable growth, there are no viable transport solutions offered. Such schemes are unlikely to be achievable as planning gain through development. The Draft Is therefore unsound and needs to be re-written to Include sustainable options.
Policy CS1.	This policy needs to be re-written to be compliant with UK Government policy on climate change. Net zero by 2050 Is an objective above the NPPF. All development in Ipswich must be at or close to net zero by 2036 otherwise the 2050 target cannot be achieved.
Policy CS5	Although Improving accessibility Is recognised, It has to be borne In mind that the vast majority of journeys into and through Ipswich are by car and there Is no objective for limiting or reducing car transport. It Is entirely likely that accessibility will decrease over the plan period. (*see additional sheets)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2nd March 2020.

RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination. yes ☐

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review. yes ☐

Adoption of the Ipswich Local Plan Review. yes ☐

PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the

creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Continuation Sheet 1 - Oliver Holmes

Policy CS8.137: Given the percentage of affordable housing in existing permissions of 5% and 4% for nearly 2000 houses, a target of 31% for the whole site of 3500 dwellings is not achievable. A more realistic percentage needs to be given.

Policy CS16 (and DM 5): A problem exists within Ipswich over sports grounds which can be illustrated by the grant of planning permission for residential development at Ipswich Sports Club in Henley Road. The hockey pitch was deemed inadequate and has been relocated elsewhere enabling potential development to take place. Although there could be shown at that particular time that the pitch was not needed, this facility was lost to this area of the town in perpetuity. Needs and fashions for sport facilities change over time, but, once the land is lost, there is no flexibility. Assessing need for Green Infrastructure, Sport and Recreation should take account of future residents and changing desires and habits of the residents over time. The Draft does not do this.

Policy CS17: Financing infrastructure through developer contributions is difficult in Ipswich as net profit margins are low and contributions are challenged by developers on viability grounds. For example, Ipswich Garden Suburb required a grant of £9.8 million from the Housing Infrastructure Fund in order to proceed. The Draft needs to reflect this difficulty otherwise it is unsound.

Policy CS20: As mentioned above, Transport in Ipswich is an area of weakness. The Upper Orwell Crossings and Ipswich Northern Route were abandoned in 2019 by Suffolk County Council. There is no evidence that Suffolk will provide any major infrastructure during the plan period. In these circumstances, all development in Ipswich will add to existing congestion within the town with no reductions in carbon and an increase in pollution and AQMAs. This makes the Draft unsound on a fundamental level. An argument can be made that no major development should take place which would increase traffic until an effective town wide mitigation strategy has been put in place.

Reference to Park and Ride schemes is aspirational. There is no evidence that Suffolk CC or Ipswich BC will fund them.

Policy DM1: To be sound, this policy needs to be re-written to take account of the national zero carbon target of 2050. Although carbon for new builds will be less than under previous standards, the level of emissions under this policy will still increase during the plan period. The default position should be zero carbon.

Continuation Sheet 2 – Oliver Holmes

Policy DM2: This policy should apply to all new build and not just 10+ residential or 1000sqm + commercial.

A 15% target is unlikely to be lawful under the net zero 2050 national objective and should be increased.

It also fails to take into account national policy on prohibiting gas boilers after 2025.

Extensions to residential property (including permitted development) will need to be compliant.

The policy should make it clear that permission will be refused unless it is compliant.

Policy DM3: Poor air quality in the five AQMAs in Ipswich is a result of road traffic – particularly NO₂ and NO_x. Mitigation needs to include a restriction on operational parking in commercial development. All new residential development needs to include significant contributions towards sustainable transport options.

The previous draft mentioned that modelling showed emissions in AQMAs were likely to increase and more AQMAs declared during the plan period. This cannot be allowed to happen.

Policy DM16: This needs to include a reference to zero carbon, as mentioned above.

Policy DM21: See comments on CS20 and DM3 above.

Site Allocations – Policy SP17: Town centre car parking generates car trips and is a significant contributor to carbon, and other, emissions within the town centre. Availability of parking is a disincentive to modal shift and more sustainable travel options. In order to be compliant with national zero carbon objectives, the Draft needs to acknowledge that car parking is material in an overall assessment of carbon emissions and the overarching objective of reducing carbon emissions. Reference to national policy and the Ipswich Climate Emergency needs to be made.

SP17 is based on a flawed 2019 Parking Strategy:

- 1.** The Strategy does not acknowledge any contribution to carbon reduction that reduced car trips into Ipswich could make.
- 2.** An assumption is made for modal shift of 10% of trips by the end of the plan period without any evidence.

Continuation Sheet 3 – Oliver Holmes

3. No analysis is made of the number of long stay places in the Princes Street area which are used by train commuters or the origin of these trips which are likely to be from outside Ipswich. Such commuters provide very little if any economic benefit to Ipswich which may offset or mitigate the carbon and other pollution they cause.

4. The Strategy assumes temporary car parks will disappear during the plan period without any evidence. Many of these car parks are of long standing and it seems likely the owners find them more profitable than redevelopment. If they are refused extensions of planning permissions after additional permanent parking in multi-storeys is provided, there is no certainty they will be refused permissions on appeal under economic arguments under the NPPF. Further, where they are located in areas not served by the three allocated sites, they have additional grounds of appeal. There is therefore a risk that additional car parking spaces will be provided through the new allocations without any decrease in existing temporary sites.

5. The Strategy must be linked to a comprehensive and sustainable transport strategy for Ipswich.

6. Temporary and long stay parking needs to be better differentiated in the Strategy. Economic grounds for shopping trips are greater than for commuter parking – which makes up the majority of existing spaces.

7. No analysis is made in the Strategy as to the reasons park and ride schemes in Bury Road and potentially Nacton Road are not currently financially viable. Suffolk CC have stated that the major reason is the availability of cheap commuter parking within the town centre. Significant on-street commuter parking in the north and south of the town centre is not quantified.

8. The contribution of emissions from drivers using the existing and proposed car parks towards poor air quality in the AQMAs is not quantified.

As Ipswich BC is the owner of at least two of the allocated sites for multi-story car parks, there must be a suspicion that fee income is a driver of the Strategy rather than planning policy.

Until a proper analysis of car parking and its contribution to carbon and other pollution is made, no sites for multi-storey car parks should be allocated.

