

# Ravenswood Environmental Group



Ipswich Borough Council  
3W Grafton House  
Russell Road  
Ipswich  
Suffolk  
IP1 2DE.

20<sup>th</sup> September 2021

Dear Sirs,

## **Ipswich Local Plan Review 2018-2036 Proposed Main Modifications**

We write in response to the Ipswich Local Plan Review 2018-2036 Proposed Main Modifications consultation with focus on MM199 and MM200 and refer to related documents and local plan text deletions as relevant.

The Ravenswood Environmental Group is extremely concerned that the Local Plan - born out of minimal and misleading consultation during a time of national emergency - is being substantially re-drafted at the Main Modifications stage.

The suggested necessary changes required to the Local Plan to make it "sound" are so significant that the plan requires proper re-assessment through the formal Local Plan process. In an attempt to overcome criticisms that the Local Plan is misleading and fails to comply with legal requirements the Borough Council is, in effect, creating a new Local Plan through its Main Modifications.

Those modifications are so significant that they point to a Local Plan at Examination which is unsound. Clearly, the process of publishing Main Modifications is not intended to allow for a redrafting of the Local Plan but that is what is proposed here.

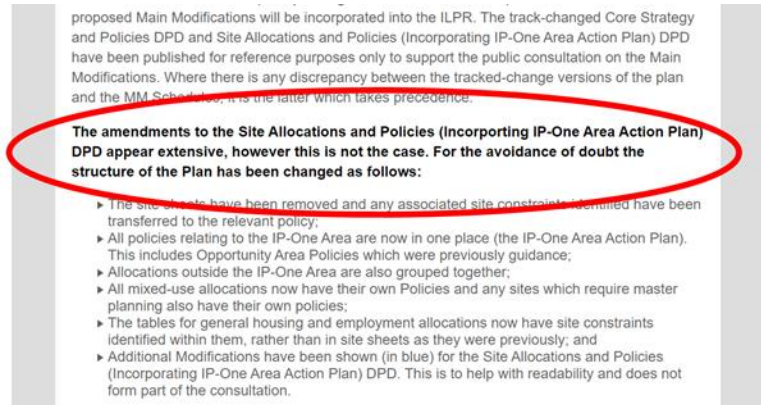
The principle concerns raised relate to the "Schedule of Proposed Main Modifications – Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review".

The entire Local Plan wording for Sites IP150b, IP150c, IP150d and IP152 is deleted and replaced by a +900 word "Frankenstein's Monster" Site Allocation Policy with 1100 words of supporting text. To confuse the reader the Policy is simply called "New Policy" and each Paragraph is called "New Paragraph" so one cannot refer to those new paragraphs or distinguish the New Policy from the many other New Policies in this New Plan masquerading as a Main Modifications consultation.

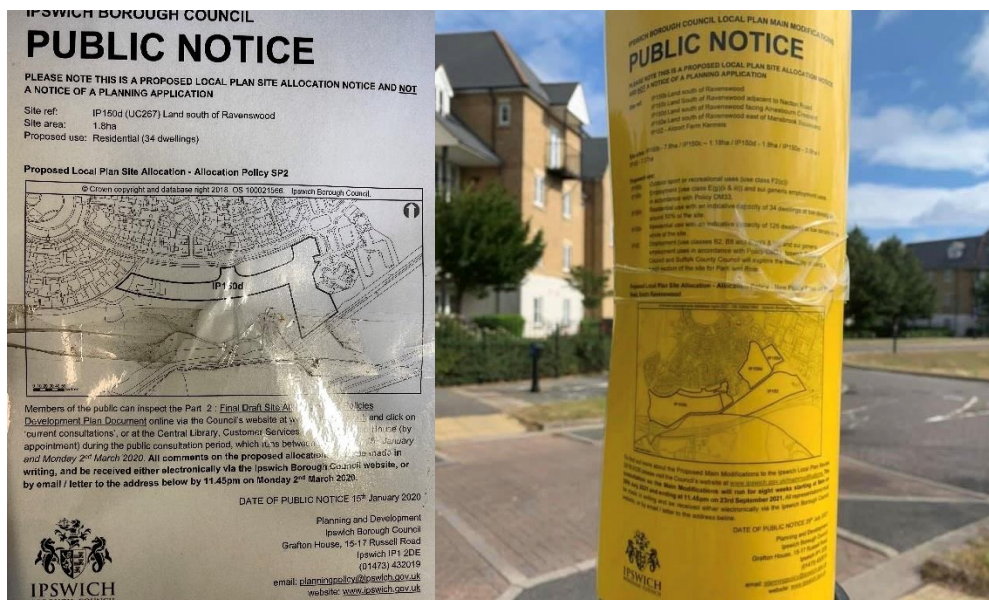
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To pre-empt the criticism that it is creating a new Local Plan at the 11<sup>th</sup> hour, the Council seeks to influence its consultees through its introductory remarks below:



The Local Plan Main Modifications has been advertised with site notices which now show each of the IP150 sites on the same plan. This consultation therefore exposes the Borough Council's previous protestations in core document K12 that a plan-based site notice which doesn't show adjacent sites is not misleading. In the 15<sup>th</sup> January 2020 Consultation, residents were looking at a site notice in front of a 1.8 hectare site but on 23<sup>rd</sup> July 2021 residents were being presented with a site notice, on the same lamppost, alerting them to a 22.7 Hectare site proposed in various individual but related parts.



The New Policy for "Sites off Nacton Road, South Ravenswood" has not been subject to proper Sustainability Assessment or Habitats Regulations Assessment

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because the updated versions of those documents add nothing to the previous assessments which failed to look at cumulative impacts of a 22.7 Hectare site.

The New Policy fails to establish an access regime for the site when it is clear that this was a primary concern of the now defunct appendix 3 alongside the Submission Local Plan. The Borough Council had previously “floated” the idea that it would be relocating the Ravenswood bus-gate at Core Document K11.

K9	IBC Response to Inspectors' Request to Define 'Inappropriate Development' in Policy CS2 - SUPERSEDED by the Schedule of Main Modifications	
K10	IP-One Area Map with Site Allocations, Quarters and Opportunity Areas	Dec 2020
K11	Ravenswood Capacity Management Options	Dec 2020
K12	Note on compliance with SCI in response to SOCS and REG comments	Dec 2020
K13	IBC response to SOCS/NFPG comments on SA	Jan 2021
K14	A1214 IGS Trigger Points Modelling note	Dec 2020
K15	IP132 Waterfront site - note on master planning and decontamination	Jan 2021
K16	Letter from Handford Homes about delivery of IBC housebuilding programme	Jan 2021

That suggestion served to emphasise that no new primary all vehicle access would be proposed for the development yet the Transport Assessment work and Local Plan drafting to date is vague. The ideas of K11 are absent from the New Policy.

If a New Policy is to be carried through to an adopted Local Plan then we believe that the New Policy should insist on a new access to this very large mixed use development site. Instead there is merely an admission in new supporting text to say that highway junctions here “are already under strain” without a coherent plan to make this very large New Policy site accessible. Without this plan or assessment, there is no justification or explanation of the capacity of this site to accommodate very significant development.

The type and tenure of housing is also a key concern here given that the Borough Council is committed to proposing a development consisting solely of Social Housing at sites UVW to the north in breach of a previously dismissed appeal. It is vital that any new residential development reflects the existing mix within Ravenswood to ensure that a balanced community is created to integrate within the locality. At sub paragraph iii the New Policy should be clear that the mix of housing should be balanced with market housing and that a 15% quota (or other specified %) should be applied to the proportion of Affordable Housing proposed. Additionally, the affordable housing should include First Homes.

At sub paragraph xv the S106 list is closed and needs to be open to mitigating the impact of the development. The list should be an open list stating that S106 Planning Obligations will be required to help to mitigate the environmental and infrastructure impacts of development. Financial contributions should include funding for a Recreation Avoidance Mitigation Strategy in the event that the New



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Plan is found sound. This would assist with mitigating the impact of industrial development and population growth upon the Orwell Estuary SPA, SSSI, RAMSAR site, Bridge Wood Local Wildlife Site and County Wildlife Site which are immediately adjacent.

Our primary concerns remain. This is not a collection of small sites; it is a large mixed use allocation which will have serious environmental and social impacts.



22.7 Hectare Development Allocation South of Ravenswood, Off Nacton Road, Ipswich.

The New Policy presupposes that each of these are fixable. It purports to import the collected, randomly expressed, alarming site constraints from the old local plan appendix. These are now cleansed and inserted into this completely New Local Plan without any certainty or evidence to suggest how an accessible, environmentally sustainable, socially inclusive, ecologically sensitive and climate crisis resilient development can be achieved.

The Main Modifications are proposing a substantially New Plan which will not, in itself, be the subject of a Local Plan Examination, arriving some 9 months after the Examination took place.

In such circumstances and in accord with the March 2021 Procedure Guide for Local Plan Examinations, it is inevitable that "further hearing sessions" will need to be held because this is "essential in the interests of fairness or in order to clarify or resolve substantial new issues arising from the representations".

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Given that we are asked to accept this New Plan, it follows that the Inspectors must accept that it is not possible to make it sound and legally compliant by making main modifications to it. The New Plan is so different to the Submission Plan the definition of what constitutes a “modification” is being stretched to an inevitable breaking point.

Yours faithfully,

On Behalf of the Ravenswood Environmental Group