

WALDRINGFIELD PARISH COUNCIL

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Our Ref: IK/JEP/2288

18 November 2009

East of England Regional Assembly

Dear Sir/Madam

Comments on East of England Plan > 2031 **by Waldringfield Parish Council**

I am writing on behalf of Waldringfield Parish Council to express their views on the above matter.

Q1: Do you think we've chosen the right growth scenarios to consider? If not, what other scenario(s) should we consider and why?

No.

All of the proposed growth scenarios are unreasonably high, and are based on dubious extrapolations of current trends - 2031 is too far off to allow reliable predictions. High growth scenarios will become self-fulfilling prophecies. These are the problems with the top-down approach taken by EERA. Local authorities should be given the flexibility to plan for changes in demand for housing in their own areas, based on local knowledge of the housing and jobs markets and the availability (or otherwise) of suitable development sites.

A near-no-growth scenario should be included. This could include provision of affordable housing, strictly on the basis of meeting local needs, e.g. people indigenous to the area who are employed locally. Britain is already overcrowded, the southeast in particular. Encouraging even more growth in the southeast will exacerbate Britain's north-south divide. There is no evidence that economic resurgence, with an accompanying increase in jobs creating a strong demand for housing, will happen.

Q2: Do you have any comments on the four growth scenarios?

Scenario 1: This is described as a 'bottom-up' approach. It is nothing of the sort. It is a continuation of the current rates of growth, which in turn were imposed on local people from Central Government. Local authorities are having great difficulty delivering the present housing allocations; increasing them will exacerbate the problems still further. There are only so many suitable sites for development, so even if there were enough to meet the 2021 figures, there will be far less to meet the 2031 figures.

Scenario 2: This requires 80,000 more homes than Scenario 1, so is far worse, particularly for the areas identified as growth areas. Expansion in Ipswich would be disastrous for the area – there are already great problems with the current housing allocations.

Scenario 3: This seems to be based on unrealistic forecasts of economic growth. It is impossible to say what the economic situation will be in the decade up to 2031.

Scenario 4: This seems to be based on unrealistic Government projections and the assumption that there will be large scale migration into the region, both of which lead to unacceptably high growth figures.

Q3: What is your preferred growth scenario and why?

None of the scenarios is acceptable, for the reasons stated in questions 1 and 2.

Q4: Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed?

Yes. The major impacts have all been covered. However, the seriousness of many of them have been understated. The obvious conclusion from these impacts is that the region is unable to absorb the increase in population and housing that is proposed in the 4 scenarios.

Q5: Do you agree that the vision and objectives of the current Plan remain suitable for the revised Plan. If not, what changes would you make and why?

No.

Generally the Visions and Objectives are fine. However, Objective (ii) “[securing a step change in the delivery of additional housing throughout the region](#)” is misguided and inappropriate, for the reasons already given in answer to questions 1 and 2.

“... [affordable housing to meet identified needs](#)” should be “... [affordable housing to meet identified local needs](#)”. The word ‘local’ is important because otherwise it could become a means to encourage unwanted and unnecessary migration into the region.

It is a pity the 4 scenarios are so strongly in conflict with these objectives. For example, it is difficult to see how building yet more houses in the eastern fringe of Ipswich, very close to an AONB, 4 SSSIs and an SPA/Ramsar site could fail to conflict with Objective (v).

Q6: Do you have any evidence to suggest that policies other than those identified need to be updated or created?

No.

Supplementary Q7: Do you have any comments on the sub-area profiles?

Haven Gateway Sub-area Profile

All 4 growth scenarios, particularly Scenario 2, would be disastrous for Eastern Ipswich fringe and the Colneis Peninsular. The current RSS has resulted in Suffolk Coastal District Council proposing a completely inappropriate new town at Adastral Park; the extra housing required by these scenarios would result in even more urbanisation to this beautiful rural area, and further damage to local communities and the environment.

§3.13 SCC’s view that there is “[some growth potential at eastern Ipswich and at Felixstowe](#)” is totally misguided. Both these areas are already having to cope with the disastrous proposals for new housing that have been imposed on them as a result of the current RSS.

§3.14 Waldringfield Parish Council objects in the strongest possible terms to David Lock’s proposals (on behalf of BT) for 3,000-3,500 houses (CP101). The site at Adastral Park is a beautiful greenfield area, 1.5km from the Deben Estuary SPA/SSSI/Ramsar site, 88m from the Suffolk Coast and Heaths AONB, and within 1km of 3 other SSSIs. It used to be lowland heathland (a scarce habitat) within living memory. This proposal is clearly in conflict with EERA Objective (v). It would overwhelm the local communities, urbanise the predominantly rural area and cause enormous traffic and other infrastructure problems. David Lock’s claim that they are putting houses next to jobs has been thoroughly discredited – a completely different set of people will live in the houses from those who will get the jobs (if any new jobs are actually generated).

§4.7 Biodiversity Action Plan priority habitats also include lowland heathland. A large area to the east of Ipswich used to be lowland heathland, which in the 1950s extended almost continuously from the edge of Ipswich to the River Deben. Sadly, much of it has been developed, but there are some isolated pockets left. These should be protected and increased wherever possible.

§4.48 & §4.49 The high level of congestion (existing and forecast) on the A12 and A14 Ipswich Bypass emphasise the problems with the development proposals for Adastral Park (CP101) and more generally for the housing allocations in the Suffolk Coastal part of the IPA.

§4.67 The Deben Estuary is an SPA and a Ramsar site.

SupplementaryQ8: Do you have any comments on the Integrated Sustainability Appraisal. Is there any further information that should be taken into account?

Such large increases in the population of the region are bound to be unsustainable, even with 'mitigation'. More houses, more cars, more land covered in tarmac and concrete, all resulting in more greenhouse gas emissions, noise, car exhaust pollution, light pollution, etc. and far greater pressures on environmentally sensitive areas. A near-no-growth option is the only one that would be sustainable.

Yours sincerely

A handwritten signature in black ink that reads "Jean Potter". The signature is written in a cursive, flowing style.

Jean Potter (Mrs)
Parish Clerk to Waldringfield Parish Council