



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Comments on the Ipswich Borough Council CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW– FINAL DRAFT January 2020 - Consultation Ending 2nd March 2020

Please find our representation on the above. We want to see a sound evidence-based Core Strategy (CS) in place which will help make Ipswich a more attractive place to live and work. We have made our comments on the CS (which we also reference as the Plan) sequentially although these will relate to the same issue in different sections of the CS. Rather than keep repeating our comments, IBC should assume that our comments on each issue apply throughout the CS to that issue, wherever the issue is mentioned in the CS. We would like to provide oral evidence at the formal planning Inquiry.

Summary of key issues

Our main concerns with the CS are mainly in relation to traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality, including the lack of funding to deliver the required improvements. For ease of reference we provide a summary of our key concerns which show that the CS is not sound without modifications to these areas.

Transport and improving accessibility

1. Previous modelling has shown that many junctions and link roads in Ipswich are already at/near capacity, but this is not addressed in the CS. There is no evidence that proposed growth in the CS is sound in relation to transport proposals in the years up to 2026.
2. Transport modelling shows severe capacity issues in 2026 at many key junctions in and around Ipswich that will result in gridlock but there are no transport infrastructure projects included in the Infrastructure Tables to resolve these capacity constraints. This is especially the case in and around the town centre, Ipswich Garden Suburb and the A1214.
3. The Transport modelling fails to identify when these Ipswich junctions will reach capacity (evidence shows that some already have) and consequently the CS fails to adequately plan for this.
4. IBC is failing to Improve Access in Ipswich in breach of CS5. More needs to be done otherwise the Modal Switch assumptions used in the traffic modelling are too high and unsound resulting in non-compliance with CS20 Transport. The CS is not justified with respect to Improving Access and Transport.
5. The Committee on Climate Change assumes that there will be a 10% transport modal shift by 2050. Where is the evidence that IBC can deliver around 15% modal shift by 2026 ? – a ridiculously short timeframe for such a high target. Unless IBC can provide evidence that it can achieve higher levels of modal shift than the CCC thinks feasible, the CCC assumption should be used in the modelling work for the CS to be sound.
6. Evidence shows that the existing walking and cycling infrastructure in Ipswich is clearly sub-standard and will not enable delivery of the levels of modal shift required without substantial improvements.

7. There is no funding allocated during the four-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS¹ to encourage modal shift, for example to change behaviours and improve cycling and pedestrian infrastructure.
8. The CS is not justified as it does not take account of proportionate evidence, especially in relation to modal shift assumptions. The New Evidence database is incomplete as it excludes several key Transport documents, especially those in relation to modal shift and the S106 schedules for the approved Ipswich Garden suburb developments which have not been made available to the Public in time to examine as part of this Consultation.
9. We are concerned that the two road bridges (and country park) may not be delivered in time (February 2022) to receive the £9.8m Housing Infrastructure Funding. If this is the case, then the CS is unsound unless IBC can confirm alternative funding will be available.
10. We are concerned that the CS is not completely positively prepared as it fails to fully assess transport infrastructure requirements, including walking and cycling infrastructure, especially in relation to timing of delivery (and as sewage infrastructure requirements).

Air Quality and the environment

11. The CS is not consistent with national air quality policy as it fails to ensure compliance with legally binding limits. There needs to be a requirement to comply with these for the CS to be sound.
12. The CS needs to strengthen the commitment to Improve Air Quality as there has been no real improvement in Air Quality in Ipswich over the past decade with the number of AQMAs in Ipswich increasing.
13. There is no funding allocated during the 4-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS for improving air quality.
14. There is no Air Quality Assessment provided as part of this consultation. This needs to be completed urgently and needs to include assessments for the early years of planned developments, all construction-related traffic (including sewage infrastructure projects) and rail/sea traffic. It needs to examine the impacts of different levels of modal shift rather than assume the unsubstantiated, extremely high levels of modal shift assumed in the transport assessment will be delivered by 2026 and thereafter.
15. There is little point in undertaking an Air Quality Assessment in 2036 as the ban on non-electric vehicles will have been implemented. It is the early years of the CS where air quality is most likely to be worst. We believe that an earlier assessment than 2026 is therefore required e.g. 2023 and perhaps 2029/30 (prior to the ban on non-electric vehicles) rather than 2036 when there will be a significant number of electric vehicles.
16. At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency. The CS needs to be updated to incorporate this to be sound.
17. We strongly object to the re-designation of the Ipswich "green rim" to "green trails". This is in breach of DM13 and unsound.
18. The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents.
19. A key problem with the Sustainability Appraisal, Habitats Assessment and Health Impact Assessment are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. There is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the unprecedented levels of modal shift

¹ <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTPF%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

required for the CS to be sound. IBC and SCC's track record in these areas is dire – what evidence is there that this will change?

20. The Sustainability Assessment is incomplete and underplays many key issues. It needs to fully assess air quality impacts including from rail and sea, the impacts of the additional road infrastructure required to prevent junctions reaching capacity, the proposed re-designation of the Green Rim, alternatives to building on Humber Doucy Lane (and that Suffolk Coastal no longer needs this land to meet its housing target), flood risk and the impacts of the new sewage infrastructure that will be required to deliver the CS. It especially needs to assess the robustness of the CS if the unprecedented levels of modal shift are not achieved.
21. The same issues relating to the Sustainability Appraisal apply to the Health Impact Assessment.
22. The Habitats Assessment also needs to take account of the same issues.

Other

23. There are still no firm proposals for new sewage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.
24. The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.
25. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector² from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan³ (paragraph 12.209). The SA fails to assess this.
26. Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective.

² https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF/-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf

³ <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options January - March 2019

We are concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered. IBC appears to be adopting the approach that SCC's Transport Mitigation Strategy for the Ipswich Strategic Policy Area (IPSA)⁴ will totally resolve all the traffic issues and fully deliver the required levels of modal shift for the CS to be sound, without substantiating this with any evidence that it will. Until such evidence is provided the CS cannot be considered effective or justified. It is particularly disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base. We agree that extremely high modal shift levels will be needed but believe that the new infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary for the CS to be sound. The level of funding needed to deliver this is massively under-estimated. There is also a significant shortfall in guaranteed funding for the insufficient measures identified in the Plan. IBC has yet to respond to these concerns.

Para 5.25

Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge as IBC is legally required to reduce pollution levels to legally binding limits and has failed to do so; there have been no material improvements to air quality and IBC is non-compliant with its CS in this respect. The planned growth levels for Ipswich will further challenge this requirement.

Given the high levels of modal shift required, IBC should be "delivering high levels of modal shift" rather than just "guiding as many trips as possible to sustainable modes". The current draft underestimates the difficulty and importance of the task.

Meeting the Climate Emergency also needs to be added as a key challenge as Ipswich Borough Council has committed to tackling this issue. Not to include it would be unsound.

Para 5.26 Table 2 – for ease of reference we have included all our comments on flood risk below, but these should be considered for all other references of flood risk in the CS.

This states that *"In addition, as part of the final draft Local Plan, a refresh is being prepared of the Ipswich Strategic Flood Risk Assessment (SFRA)." Paragraph 6.1.6 then states that "The Council's Level 2 Strategic Flood Risk Assessment (SFRA) was revised in 2019. It provides guidance on residual flood risk both for the situation before and after completion of the flood barrier. The SFRA also suggests a framework for safe development. The safety framework is detailed in the Council's Development and Flood Risk SPD (September 2013) which is in the process of being updated"*. How can a 'framework' developed in a document (SFRA) dated 2019 be detailed in an SPD dated 2013? It is not clear which Safety Framework applies to the CS.

However, the IBC FRA webpage⁵ only references the 2011 SFRA version and does not show the 2019 version referenced above. We also note that the Local Plan New Evidence database includes a draft 2020 SFRA as well. It is not clear when or if this has been adopted. The IBC website also states that

⁴ <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/IPSA-Transport-Mitigation-v13F.pdf>

⁵ <https://www.ipswich.gov.uk/content/strategic-flood-risk-assessment-sfra>

the Flood Risk SPD “was first updated in May 2014 and has subsequently been updated in January 2016 to reflect changes to national and local policy and guidance⁶.”

Paragraph 8.45 states “On flood risk, it concludes that an updated Strategic Flood Risk Assessment is needed to model the boundaries of Flood Zones 3a and b; drainage strategies should be prepared for all sites; and the sequential and exception tests need to be applied to all sites in flood zones 2 and 3.” It is not clear if the draft 2020 SFRA meets this requirement. The paragraph then goes on to state that “Further guidance is contained in the Development and Flood Risk Supplementary Planning Document 2016”. Clearly the 2016 SPD cannot possibly adequately reflect the draft 2020 SFRA.

Paragraph 8.46 states that “the Ipswich Surface Water Management Plan⁷ was produced in [June] 2012 and is currently under review”. This is clearly obsolete and fails to take account of climate change. Under the NPPF hierarchy for managing flood risk, this is the key document/means of controlling flood risk. This review needs to be completed urgently and incorporated into the CS for it to be sound. We are concerned that IBC no longer has a Drainage Team/Officer that can undertake this important work and the loss of such expertise leaves Ipswich and its residents at greater risk of flooding.

Paragraph 8.225 states that “Part C of this document includes policies relating to flooding to reflect the NPPF and the detailed findings of the Ipswich Strategic Flood Risk Assessment”. But it does not reference which SFRA version it relates to. IBC needs to confirm that this is compliant with the draft SFRA 2020

Policy DM4 states that “it [development] will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy⁸”; However, the document was produced in 2016 so doesn’t include the full risk of flooding from climate change so there is no assurance that development will be adequately protected.

Suffolk County Council’s Preliminary Flood Risk Assessment (PFRA) was published in 2011⁹ and had a 3 page addendum¹⁰ in 2017. A Preliminary Flood Risk Assessment (PFRA) is an assessment of floods that have taken place in the past and floods that could take place in the future. It considers flooding from surface water runoff, groundwater and ordinary watercourses. This is also therefore out of date and will not fully take account of climate change. We believe an update is required to ensure the CS is sound.

In the 2017 Addendum, SCC used a national data set to predict flood risk, but these do not include climate change allowance output, so SCC have projected the potential number of properties at risk for the 0.5% AEP for the PFRA. The results show that Ipswich is the area at greatest flood risk and has been identified as a Flood risk area (FRA) for the purposes of the Flood Risk Regulations (2009) second planning cycle. The Addendum states that “To improve SCC understanding of climate change in priority areas, local modelling updates will assess the impact of climate change.” It is not clear

⁶ <https://www.ipswich.gov.uk/content/development-and-flood-risk-spd>

⁷ <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/Ipswich-Flood-Risk-Management-Strategy-v12.pdf>

⁸ <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>

⁹ <https://www.suffolk.gov.uk/assets/Roads-and-transport/Flooding-and-drainage/SUFFOLK-PFRA-REPORT-FINAL.pdf>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698246/PFRA_Suffolk_County_Council_2017.pdf

whether this modelling has been done or how it has been included in the CS. Clearly this needs to be incorporated into the CS for the CS to be sound.

The current situation regarding flood risk assessment within the CS is ambiguous and confusing and makes the CS flood risk situation impossible to understand for the general public. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be understood by residents and for it to be sound. Given the current terrible flooding and that Ipswich is an FRA, this is a key issue that needs correcting.

Para 6.7

The Vision needs to include an improvement in air quality levels and compliance with legally binding targets that are currently exceeded. IBC should have a Strategic Policy to comply with legally binding air quality targets and eradicate AQMAs within Ipswich for the benefit and protection of residents. The Climate Emergency also needs to be recognised in the Vision (please see our comments under CS1).

Objective 6.8.4

This Objective needs to be strengthened to recognise the Climate Emergency for the CS to be sound (please see our comments under CS1).

Objective 6.8 5

It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely. IBC needs to comply with legally binding targets otherwise its CS is unsound.

Objective 6.8 6

IBC has decided to remove its previous Objective to achieve modal shift of 15% by 2031 in the current Local Plan and needs to be asked why it has done this given this is still required for the CS to be sound. SCC Transport modelling (which we discuss later) confirms that major modal shift is required to deliver the CS (e.g. c15.5% by 2026 for existing journeys). Given the importance of achieving high levels of modal shift to deliver the Plan, it is imperative that a modal shift target for 2026 is included for the CS to be sound. IBC needs to explain why it no longer thinks having a modal shift target is important.

Ipswich CS Authority Monitoring Report 13, 2017/18 June 2019 fails to adequately report back on the current Objective 6 f. TARGET: To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031. Simply stating *“The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review.”* We believe the reason that the target has not been reported on is that little or no progress has been made and the that is has been removed because IBC knows it cannot be achieved. IBC needs to report the modal shift levels achieved through Travel Ipswich (formerly known as Ipswich – Transport Fit for the 21st Century) as this will indicate what levels of modal shift can be achieved in Ipswich.

We also note that Appendix 5, pg 55 states *“The 2018 Travel to Work survey ran from the 7th May to 29th June 2018, outside the 2017/18 monitoring period. The 2018 results show that driving (single occupant and car share) remains the most frequently used mode of travel at 64.7% in 2018, an increase from 62.6% in 2017. The percentage of those travelling as a single occupant has risen compared to last year and currently stands at 62.6%, 3.5% higher than in 2017.”* This illustrates how difficult the required levels of modal switching will be to achieve, without which the CS is clearly unsound.

We believe IBC has failed to make any progress on the modal shift target of 15% by 2031. It clearly needs to provide evidence that it can deliver the required modal shift levels identified by SCC (e.g. c15.5% by 2026 for existing journeys) for the CS to be sound. If not, the CS needs to be revised accordingly to be sound.

IBS states that *“Additional east-west highway capacity could be provided within the plan period”* and needs to illustrate what it means by this and whether such capacity is required for the CS to be sound.

Paragraph 8.19, which states *“In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the longer term.”* Ipswich Borough Council states support for such a route. We would like to draw attention to the article in the Ipswich Star (27 February 2019¹¹) where the leader of Ipswich Borough Council, David Ellesmere, is quoted as saying *“A northern bypass is a priority infrastructure project for Ipswich”*. A position that was repeated in the East Anglian Daily Times Article¹² published on 22/02/2020 *“It remains our position that the best solution would be the construction of the inner route of the northern bypass [to ease traffic problems in Ipswich]. Both the previous Labour and current Conservative Ipswich MPs have also argued for a northern route as a priority for Ipswich. This paragraph and the CS need to be updated to take account of the decision that the northern route will NOT be progressed further by SCC. Ipswich Borough Council needs to explain why its elected leader clearly believes that Ipswich cannot cope with existing volumes of traffic and that it is sound for the CS to increase traffic further. The Local Plan also needs to recognise that Suffolk County Council is also concerned about the ability for Ipswich to manage the existing volumes of traffic and announced on 18 February 2020 that it is setting up a taskforce to look at new ways of tackling the town's traffic problems. In response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road”*.

We agree with the leader of Ipswich Borough Council and its local MP that some form of northern route is still required for IBC to deliver its targets in a sound manner. The SCC consultation exercise shows that many Ipswich residents share this view. Unless there is a huge change in public attitudes and behaviour plus substantial investment in other means of sustainable travel, improving the existing road infrastructure, including new technology, homeworking incentives, off-peak travel pricing incentives, regulatory instruments etc, a northern route is required to deliver the Plan. Currently IBC has insufficient firm proposals or funding to deliver the required 2026 modal shifting target and subsequent modal shift levels throughout the CS period. The CS is therefore unsound as it lacks a credible transport solution that would support the proposed levels of growth.

¹¹ <https://www.ipswichstar.co.uk/news/ipswich-northern-bypass-latest-1-5908955>

¹² <https://www.eadt.co.uk/news/ellesmere-on-travel-taskforce-1-6527021>

Para 6.17 - this should be considered as our representation for this site in respect of the consultation on the associated Site Allocations & Policies.

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road, which is no longer required by Suffolk Coastal to meet its housing target as this has been reduced substantially by the Planning Inspector:

1. The **Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018** Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.
2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc. We note that Ipswich Central is also advocating an increase to the number of homes in the town centre¹³. This will help improve the town centre and the night-time economy, reduce traffic into the centre town (compared to other new build sites), facilitate modal shift and improve air quality. Why has this option not been considered by IBC?
3. We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane.
4. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.
5. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim” (regardless of the land having been designated as countryside). In our view, this is why Ipswich Borough Council wants to re-designate the green rim as bike and cycle trails without any justification and a distinct lack of cycle trails in the “green trails”. We discuss this in detail in our comments to Chapter 7, which should also be considered here.
6. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim. It is also

¹³ <https://www.ipswichstar.co.uk/news/ipswich-needs-4-000-new-homes-1-6516012>

effectively non-compliant with Paragraph 8.80 as it is inconceivable there will be net gains in biodiversity and green infrastructure by building on the green rim.

7. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.
8. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.
9. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector¹⁴ from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756) i.e. a reduction of 720 homes over the Plan period. Clearly Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) that it had included in its final draft plan¹⁵ (paragraph 12.209) and the allocation of this land is therefore not sound.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. For the CS to be effective, the Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

CHAPTER 7: The Key Diagram (and all other references to the green rim/trail)

We strongly disagree with the proposed change to replace “green rim” with “green trail” in (v) The ecological network, green corridor and green rim approach to strategic green infrastructure (policy CS16). The proposed change to the green rim has not been assessed by the Habitats Regulations Assessment (HRA) and needs to be included in the HRA accordingly.

The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it.

The Ipswich Local Plan – Regulation 19 draft presented at the Council Meeting on 8th January 2020 states, in the last paragraph of Section 2.47 The Development Management, that *“There has been some confusion arising from the Preferred Options consultation responses on the purpose of the ‘green rim’, which are principally orbital routes for walking and cycling around the periphery of the Borough although it is acknowledged that they are important routes for biodiversity and the wider ecological network. It is suggested that these be renamed as ‘green trails’ which shows that these areas are also connected with walking and cycling.”*

It is our view that the Council in its paper is mis-leading Councillors as the concept of corridors and the green rim was for the corridors to provide access on foot or by cycle to the countryside surrounding Ipswich. That countryside then became known as the green rim and the intention was for the green rim to be protected from development. We note that in subsequent CSs the green rim has been considerably reduced in size, which demonstrates the Council’s lack of commitment to protecting open space and improving biodiversity in its own Plans. The change in definition is effectively non-compliant with policy DM8.

¹⁴ https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF/-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf

¹⁵ <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

In our view, the Council is doing this so that it can bring forward land around Humber Doucy Lane, which has previously been designated as countryside, and then as part of the green rim, for development in the revised draft of the CS by removing the protection that it currently has. If the Council wants to do this then it should be clear and transparent that it proposes to build on land previously designated as countryside/green rim rather than by deviously trying to re-designate the land as a pedestrian/cycle green trail (which was never the intention of previous CSs). We believe that there are other brownfield sites in Ipswich that could be used instead.

In Appendix 1, we illustrate the history of the green rim/corridors in various drafts of the CS below and include a comparison of actual cycle routes to the revised green trails demonstrating that it is the Council that is “confused” about the original purpose of the green rim. We also note that there is no mention of the Green Rim (or Green Trail) being used for cycling in the Ipswich Cycling Strategy¹⁶ adopted in March 2016 as part of the CS.

Chapter 8 Scale and location of growth

We have argued for many years that previous homes and employment targets set by Ipswich Borough Council were too high, unrealistic and based upon flawed evidence. It is now clear that previous Plans were unsound and by their very nature were therefore sub-optimal for Ipswich as we argued strongly at the time. It is disappointing that Ipswich Borough Council has taken so long to accept this. We believe the proposed lower targets are more realistic. We agree with IBC that it has established a 5-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply.

Policy ISPA2 Strategic Infrastructure Priorities

This needs to include the following highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound.

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen’s Street
4. St Helen’s Street / Bond Street Bus lane removal (we question how this will improve bus services?)
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares

¹⁶ https://www.ipswich.gov.uk/sites/default/files/cycling_strategy_spd.pdf

11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout [we note this is not in Ipswich and appears to have been incorrectly grouped under Ipswich]

This list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson after by occupation of the 299th home on its Henley Grange IGS site (as stated in the planning application Decision Notice). It needs to be confirmed whether this infrastructure project has been included and modelled accordingly. It needs to be added to the list of projects.

We support the inclusion of sewage infrastructure in ISPA2. We have argued for this for many years and its inclusion is long overdue. We believe specific reference to it being required for the delivery of the Ipswich Garden Suburb, which still has no agreed site-wide sewage infrastructure solution after over 10 years of planning for one.

Policy IPSA4 and Paragraphs 8.24-8.26

Please see comments on Paragraph 6.17. Paragraph 8.24 states that development will “*follow the delivery of the Ipswich Garden Suburb*”. We disagree on the need for this land to be developed, but if it is then it needs to be made clear throughout the CS document that this can only happen following the delivery of the IGS development, rather than “appropriately phased”. Without this stipulation it could detrimentally impact on demand for homes at the IGS leading to a stalled and incomplete development of the IGS for many years. It is premature to phase it with the IGS development rather than at the end of the IGS development.

Policy CS1

Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal’s ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

Policy CS4, Policy CS17 and DM8

The existing green rim is an asset and should be protected, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it (see above). It should be included in CS4 accordingly for the CS to be sound.

We have some concern that IBC may not be providing enough recreational mitigation for its RAMSAR sites. It is not clear what RAMS S106 payments (agreed on 30/01/20) have been agreed with CBRE and Crest IGS sites as the S106 have not been made publicly available by IBC with its Decision Notice in February 2020 on granting outline application approval.

Supplementary Planning Document (SPD) 2019

This was approved by the Executive on 7th January 2020, which implies the S106 agreements should include RAMS mitigation payments as they were agreed after the SPD was approved by the Executive.

We note that Paragraph 2.4 states *"It should be noted that some residential schemes, particularly those located close to a European Site boundary or large scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment)."* Therefore, it would appear that the delivery of the Country Park is therefore an additional requirement to the RAMS tariffs.

However, IBC did not request any S106 contributions from either CREST or CBRE for any of their homes on the IGS for recreational mitigation when the outline application was approved subject a number of conditions at the Planning & Development Committee Wednesday 4th April 2018
CREST - Para 5.16 of <https://democracy.ipswich.gov.uk/documents/s20697/Item%2001.pdf> other than £7.5k HRA for monitoring
CBRE - Section 10 of <https://democracy.ipswich.gov.uk/documents/s20700/Item%2002.pdf> other than £7.5k HRA for monitoring

The SPD also states

3.2 What types of application does this apply to?

The Suffolk Coast RAMS tariff applies to all full applications, outline applications, hybrid applications, permitted development, and reserved matters applications where no contribution was made at the outline application or hybrid application stage.

Sites that already have planning permission will not be required to pay any additional mitigation sum, unless they are resubmitted for consideration.

3.3 The Suffolk Coast RAMS contribution is payable in addition to any Community Infrastructure Levy (CIL) liability and/or any other S106 or S278 contributions for other types of contribution and there may be other site-specific mitigation requirements in respect of European Sites and ecology.

If there are no RAMS tariffs included in the S106 agreements this could be in breach of this SPD, Policy CS4, CS17 and Policy DM31 The Natural Environment of the current Ipswich CS. It also means the new CS would be unsound in relation to CS4 CS17 and DM 8 The Natural Environment as there is no means of funding the required. We believe further examination of the issue is required to provide confidence that the CS is sound in relation to this issue.

Policy CS5 Improving Accessibility

States that the Council will work with the Highway Authority including through the Local Transport Plan to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network. During the duration of the current CS and despite the agreement of the Cycling SPD, we have seen no improvements to the cycle network. Indeed, the only major changes that we are aware of are:

- The removal of the dedicated cycle lane on Felixstowe Road out of Ipswich towards Sainsburys.
- The construction of steps on the Cornhill effectively blocks off the previous direct cycle route between Lloyds Avenue and Princes Street. This was the only cross-town cycle route that did

not involve the use of dangerous counter-flow cycle lanes (Northgate Street and Museum Street) in the town centre. Neither of these counter-flow cycle lanes meet cycle lane guidelines¹⁷.

Both these changes, especially the town centre one, result in a more segregated cycle network and will deter cyclists rather than encourage them. We also note that the cycle route along the Christchurch Park Bridleway remains in a dangerous state of repair since the current CS was approved. This shows a distinct lack of commitment to even maintaining the existing cycle network.

We also note that much of the Ipswich cycling infrastructure is sub-standard and fails to comply with recommended minimum standards for cycle lane width for both dedicated cycle lanes and shared pedestrian/cycle routes. The latter acts as a barrier to both walking and cycling. The required levels of modal shift will not be delivered with such sub-standard infrastructure.

Paragraph 33 of the Transport Topic paper states that “*There has also been a variety of cycling and walking initiatives built around the balanced transport plan for Ipswich*” but fails to provide any evidence of this. The Council needs to detail the initiatives delivered by the Council in the last few years since the adoption of the current Core Strategy and the Cycling Strategy Supplementary Planning Document in March 2016 and the current CS in February 2017 and advise on the level of modal shift has been achieved by them. We have not been able to find any evidence of the levels of modal shift achieved by these initiatives (nor what the specific initiatives actually are). In relation to the provision of cycling infrastructure in the current CS, there seems to have been no progress in delivering the requirements of:

- CS5 Improving Accessibility Enables access across town safely and conveniently by foot and by bicycle - work with the Highway Authority through the Local Transport Plan prioritise the development of an integrated cycle network.
- CS16 Green infrastructure, Sport and Recreation Strengthens ecological networks that link inner and outer parts of the Borough by providing walking and cycling routes.
- CS20 Key Transport Proposals Seeks improved cycling and walking routes between key nodes.
- SP15 Improving Pedestrian and Cycle Routes Support improvements to pedestrian and cycle routes within the IP-One area and linking the town centre to residential areas and beyond.

The level of achievement by IBC will help determine how effective the CS is likely to be in delivering its accessibility and modal shift objectives and whether it is sound in these respects.

The SUFFOLK COUNTY COUNCIL Draft Local Cycling & Walking Infrastructure Plan (dated 15/03/2019 presented at Suffolk Cabinet 20/January 2020)

This identifies the requirements and options for planning of future opportunities to make improvements to the cycling and walking network. We are disappointed that this document has not been included by IBC in the Evidence Base as it clearly shows the poor existing walking and cycling infrastructure in Ipswich. The draft LCWIP assesses a number of corridors in Ipswich but does not include any actions or funding to improve these. The corridors are assessed using WRAT and CLOS

¹⁷ The desirable minimum width of any contraflow lane is 2m. Where space is constrained it may be reduced to an absolute minimum of 1.5m. The width of the with-flow traffic lane may be as little as 2.5m where there are low volumes of heavy goods vehicles and the servicing needs of shops and other premises are met by off-street loading or other means. The preferred minimum width is 3m as this is less likely to cause with-flow traffic to encroach upon the cycle lane. Cycling England A.06 Contra-Flow Cycling.

assessment tools.

As part of the Welsh Active Travel Design Guidance a Walking Route Audit Tool (WRAT) was developed to assist Local Authorities with the auditing of walking routes. The auditing methodology targets the five core design outcomes for pedestrian infrastructure, which are similar to those for cycling. These are: • attractiveness • comfort • directness • safety • coherence. Each design outcome has several sub-categories that are each scored 0-2 with a score of 70% (28/40) being normally regarded as the minimum provision overall.

CLOS (cycle level of service) scores Cycling Level of Service is an audit tool developed by Transport for London. It is designed to assess the quality of cycling provision in existing (and proposed) schemes, with a final score out of 100. Good (Dutch-quality) schemes should be scoring between 70 and 80 out of 100.

In order to achieve the high targets of modal shift then, the key corridors should exceed the minimum standards of good design. However, it is clear from the assessments below that the existing walking and cycling infrastructure in Ipswich is massively sub-standard and without major improvements there is absolutely no chance of achieving the modal shift targets required and hence the CS is unsound in respect of Policy CS5 and subsequently CS20 Transport and DM3 Air Quality.

Corridor	WRAT	CLOS
Minimum level required	28	70
London Rd / Hadleigh Rd	27.2	58
Wherstead Rd	24.4	32.6
Henley Rd / Westerfield Rd	24.7	37.2
Birkfield Drive	18.25	41.5
Hawthorn Drive	19.5	30.7
Inner orbital	31	45 estimated from parts that can be scored unable to provide average score as some parts have no cycling or walking provision
Gipping River Path	20.6	44.3
Woodbridge Rd / Spring Rd	28.6	42.3
Nacton Rd / Landseer Rd	27.8	41.4

It should also be noted that the assessments are based on the most suitable route, rather than routes walkers and cyclists might actually use so these scores will be higher than what is will be experienced on average. Clearly cycling and walking in Ipswich is currently an unattractive, unsafe, incoherent, uncomfortable experience that is also non-directional.

The Transport Modelling, which we will discuss later, includes extremely challenging modal shift assumptions. Unless IBC can provide evidence of sufficient funding and plans in place to improve the ineffective cycling network the required levels of modal shift cannot possibly be achieved, and the CS cannot be found to be sound.

We also note that Ipswich Buses, operated by IBC, continues to use the outdated approach of having bus routes that just go into town rather than establishing radial routes such as along the A1214/Heath Rd from ASDA/Whitehouse, past the hospital, to Futura Park/Ransomes/Havens. Bus route 2 currently stops at the hospital and could easily be extended to the ASDA/Whitehouse area. Such an approach would provide a more direct quicker route for many people and have the advantage of avoiding the town centre AQMAs. We would like to see the CS Preferred Options include a requirement on IBC to assess and test the viability of such bus routes to Improve

Accessibility and help contribute to modal shift. Substantial investment in the Ipswich bus network is required, including the expansion of the Ipswich Park and Ride network.

IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS¹⁸

This Financial Plan covers up to 2023/24 and was approved at Council on 19/02/2020. Paragraph 32 identifies IBC's top ten projects for this period, which includes "providing high quality multi-story and surface car parking". However, there is no money allocated over the four-year period to improving air quality, delivering modal shift or improving cycle and pedestrian infrastructure (i.e. to improve accessibility) despite the CS being dependent on achieving 15% modal shift and IBC being in breach of legally binding air quality limits. There is not even any mention of 'modal shift', 'air quality', 'cycling', 'walking', 'traffic' or 'sustainable travel' in the 98 page document, which would appear to illustrate the lack of commitment of IBC to invest in improving these areas. IBC is clearly prioritising encouraging people to drive into the town centre rather than use more sustainable means. The CS is clearly not effective as IBC has not allocated any funding towards delivering modal shift or improving air quality.

Paragraph 8.97 and Policy C20 e) reference to the [Car] Parking Strategy and Plan

It is not clear if the Ipswich Parking Strategy as drafted by WYG Transport Planning dated March 2019 has actually been approved by the IBC Executive. The IBC website Decision List shows a decision by the Executive was due on 29th October 2019, but the Strategy was not on the agenda. It now seems to have disappeared from the Decision List without a decision being made. IBC needs to detail the current situation with the Parking Strategy.

Paragraph 2.4.6 states that the Strategy is based on 12,500 additional jobs target 2011-2031 on 35 hectares whilst the proposed target is for approximately 9,500 jobs on 23.5 hectares by 2036 – a substantial reduction. Paragraph 2.4.4 states that it is based on 8,840 new dwellings by 2036 – the new target is 8,010. The new targets therefore render the Strategy obsolete. With the reduction in these targets, especially new jobs, it is logical to assume there will be a reduced requirement in land for car parking. We believe this brownfield land would be better used for housing before any development of the Humber Doucy Lane site. The CS is unsound in allocating the Humber Doucy Lane site for housing ahead of excess brownfield car parking sites. As shown in its FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS, IBC is prioritising improving town centre car parking and encouraging car journeys into town ahead of funding the encouragement of more sustainable forms of transport. This is in breach of the proposed CS

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. The Car Parking Strategy drafted in March 2019 needs to take account of this, especially given the Council operates many car parks in Ipswich, for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

Policy CS10 Ipswich Garden Suburb

¹⁸ <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

We have major concerns on the ability of the road network to cope with the additional traffic from the IGS without some form of northern relief road.

We are pleased that IBC secured £9.8m from the Housing Infrastructure Fund for the country park and the two road bridges over the railway. We believe this money is required to be committed by March 2022 (following an extension to the original date of March 2021). If this is the case, we are concerned that this critical infrastructure may not be delivered in time to secure the funding as work is yet to start on-site. We are particularly concerned that the relevant Decision Notices granting Outline Planning Permission for the Crest Nicholson IGS development only requires the Vehicular Bridge to be delivered upon the delivery of 699 homes. Clearly it is impossible to build this number of homes before March 2022 although it may be possible to demonstrate “commitment” as required by the HIF. We are already concerned that the existing Henley Road bridge over the railway is not wide enough to allow cyclists, pedestrian and cars to pass safely yet there are no improvements planned for this bridge. Without the early delivery of the road/pedestrian bridge and associated links into town that avoid the Henley Rd rail bridge, there is no safe walking/cycling route from the Crest Henley Gate development into town and the CS would consequently be unsound.

The Section 106 agreements for the two approved IGS sites may well include measures to safeguard HIF funding, or provide for other means of securing the required funding. These are technical and complex documents that are difficult for the public to understand. We believe that IBC needs to provide evidence that this infrastructure will be delivered in time to secure the funding and that contingency measures are in place to secure alternative funding for this infrastructure for the CS to be considered sound. As we discuss later in our submission the delivery of the IGS road infrastructure problems needs to be compatible with the dates assumed in the SSC traffic modelling. Evidence needs to be provided this is the case, before the CS can be found to be sound.

We are pleased to see that S106 payments agreed for the two approved IGS sites include funding for improved off-site infrastructure such as improving the Bridleway, cycle routes and providing crossings on Valley Road and Park Road. However, the trigger points for these payments are split into three instalments, with the last one prior to occupation of 500 homes for the CBRE/Mersea site and 600 homes for the Crest Nicholson site. Unless funding is provided from elsewhere to deliver the offsite infrastructure earlier than these trigger point dates, the required levels of modal shift will not be achieved by 2026 as the required sustainable travel infrastructure around the IGS will be incomplete.

We note that the S106 payments schedule for Henley Gate requires Crest Nicholson to deliver the Smarter Choices Programme for homes between Norwich Road and Henley Road (bounded by Valley Road). However, this is not required to commence until occupation of the 500th home. Consequently, there will be no modal shift programme implemented for this area in time to deliver the 15% modal shift requirement that is assumed in the transport modelling by 2026. The CS is therefore unsound in this respect.

WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will become unacceptably congested around the Ipswich Garden Suburb.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that this junction is approaching capacity in 2026.]

- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

However, previous modelling for both Application IP/16/00608/OUT Land North Of Railway And East Of, Henley Road, Crest Nicholson (see Paragraph 5.121) and Application IP/14/00638/OUTFL Land To South Of Railway Line, Westerfield Road, CBRE/Mersea Homes (see Paragraphs 5.69 and Paragraph 8.484) has shown that these junctions are already operating at or near capacity at peak times and will continue to do so. By applying a 15% modal shift reduction, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads already operating at capacity at peak times.

In addition, Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times and either side of the peaks, is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound for Transport and Air Quality. The modelling work needs to identify when these junctions and links reach capacity and how congestion will be mitigated as evidence for the CS to be sound; there is a big difference with this happening in say 2027 or 2035 between the modelled periods or even before 2026 in some cases.

We are also concerned that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Road and Dale Hall Lane as well as Park Road, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc. We are also concerned that Air Quality limits will worsen between now and 2026 yet there is no assessment of this.

We note that the CBRE/Mersea planning application for the IGS assumed that the “flagship project” Ipswich – Transport Fit for the 21st Century (renamed Travel Ipswich) would reduce dependency on car by 15%, whilst the Crest application assumed 20% reduction for work, business and other activities. It is clear the current network is completely UNFIT for the 21st Century and without substantial additional investment than that proposed it will remain this way.

Despite the Cross-Boundary Water Cycle Study report¹⁹ there remains a lack of understanding and detail on what new additional sewage infrastructure will be required or evidence that the sewage infrastructure required for the IGS can be delivered despite first requesting this almost 10 years ago. Anglian Water’s proposed strategy to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Road solution was briefly mentioned in the outline planning application for the Mersea Homes outline planning application for Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL. There is still no agreed solution despite the two IGS outline applications being approved in February 2020. We note that IBC has stipulated that “Prior to the submission of the first Reserved Matters application a Site Wide Foul and Surface Water Drainage Strategy which covers the entire development site.”

If sewage infrastructure cannot be provided at the right time and at the right price for the IGS (as a whole) then the IGS cannot be delivered in accordance with the Plan. The implications of the

¹⁹ https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study_jan_2019.pdf

construction of new sewage infrastructure on Ipswich need to be considered as part of the CS. For instance, providing a 550cubic metres sewage storage tank under Valley Road. will require its closure for many months and have a major detrimental impact on traffic and air quality in Ipswich. Sewage infrastructure requirements urgently need to be considered in Policy CS10 and included in the Infrastructure Table 8b. In our view, all off-line sewage storage should be provided on the IGS site to minimise traffic impacts and prevent the worsening of Air Quality in areas already exceeding legal limits in Ipswich.

The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the CS period and plan for its provision. This remains a major failing of the CS making it unsound. We note that improvements to sewage infrastructure has been included in ISPA2 and it also needs to be included in relation to the IGS.

The potential impact of Sizewell C on the IGS and the CS has not been assessed in any form of sensitivity analysis. We have previously raised concerns of the impacts of increased rail freight for Sizewell C on the Ipswich – Westerfield stretch of the rail-line regarding air pollution, noise, operation of Westerfield level crossing and the proposed pedestrian bridge, which have been ignored. In its response to the latest consultation on Sizewell C²⁰, we are pleased to see that IBC now shares these concerns, but still fails to assess the potential impacts in relation to the IGS and the CS. The potential impacts of Sizewell C as raised by IBC in its consultation response needs to be assessed in relation to the soundness of the CS preferred options through sensitivity analysis prior to a decision being made on whether it proceeds.

We believe the Council's estimate requirement for increased retail space in Ipswich town centre remains flawed and question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets). We believe that less retail space will be required in future and that some of it should be reallocated for housing in preference to of green space at the northern end of Humber Doucy Lane and Tuddenham Road. As mentioned above we believe there will be less land required for car parking in and around the town centre and that this land should also be reallocated for housing ahead of the Humber Doucy Lane green space for the CS to be sound.

Policy CS16 Green Infrastructure, Sport and Recreation

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16, e.g. in relation to the protection and enhancement of green corridors. The CS is therefore unsound.

POLICY CS17: Delivering Infrastructure

We remain concerned that the proposed development of the Ipswich Garden Suburb without improved road infrastructure will severely impact on traffic congestion and air quality and adversely affect the quality of life of residents.

At a strategic level, the Water Cycle Study concludes that, based on the predicted housing growth in IBC and SCDC, it is anticipated that no works/ upgrades to the existing water recycling centre (WRC)

²⁰<https://democracy.ipswich.gov.uk/documents/s23982/Item%2011%20Appendix%20%20Sizewell%20C%20Stage%203%20consultation%20IBC%20proposed%20response.pdf>

at Cliff Quay, other than those already planned by Anglian Water, are required. In terms of the Ipswich area, Anglian Water have the following three projects committed in their Water Recycling Long-Term Plan (2018)²¹

- Increased Water Recycling Centre Process Capacity - £12.3m cost – Scheduled for completion by 2032;
- Combined Sewage Overflow improvements - £11.96m cost – Scheduled for completion by 2027; and
- Increased Drainage Capacity through surface water management and upsizing (Defined Contingent Scheme) - £15.496m cost – Scheduled for completion by 2027.

This is clearly major infrastructure that is required for the delivery of the CS and should be included in the Infrastructure Table for the CS to be sound.

However, there is still no sewage infrastructure solution for the IGS or for the wider ISPA area despite it being a strategic priority (Policy ISPA2 Strategic Infrastructure Priorities i)). IBC needs to work far more closely with Anglian Water (and ISPA) to undertake a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure in and around Ipswich to identify and cost key infrastructure deliverables. These need to be properly included in both CS Infrastructure Tables 8A and 8B as well. Without proper assessment and clear details of required sewage infrastructure to deliver the CS it is clearly unsound.

Please see our comments under Policy CS4 in relation to RAMSAR sites.

POLICY CS20: Key Transport Proposals

It is worth noting that The Upper Orwell Crossings (the Wet Dock Crossings) will not proceed as there is insufficient funding (although new proposals for pedestrian crossings may be developed). SCC has also confirmed the Ipswich northern relief road will also not proceed. Without these major infrastructure projects, we believe increased congestion is likely to be severe and unacceptable without substantial investment in improving the existing road network, bus routes, rail services, dedicated cycle routes and major funding to support modal shift including funding to change the attitudes and behaviours of existing residents in relation to their transport modes. We believe that evidence needs to be provided to the Planning Inspector that substantial funding is available to deliver these improvements for the CS to be found to be sound.

We note that the traffic modelling does not assess the impacts of the potential construction of Sizewell C. Clearly this will have a major impact on traffic in Suffolk and Ipswich as recognised by IBC in its latest consultation response on Sizewell C proposals. As well as construction traffic itself, IBC agrees there will be an increase in the number of outward commuters from Ipswich/local areas and weekly commuters from further afield. The Transport assessment will need to be revised if Sizewell C proceeds.

We are pleased to see the WSP/ Suffolk County Council ISPA LOCAL PLAN MODELLING Methodology Report and the WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions – (January 2020) which updates previous January 2019 modelling work. However, we have major concerns with some of the key assumptions and outputs.

ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2

²¹ <https://www.anglianwater.co.uk/assets/media/water-recycling-long-term-plan.pdf>

As mentioned above this shows the future highway schemes which have been included in the forecast model networks within Ipswich which are all assumed to be in place by 2026 (we have added relevant references to IGS for clarity).

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal [we question how this will improve bus services?]
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road [required as part of Crest Nicholson planning consent]
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access [required as part of CBRE planning consent]
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction [should be required as part of Red Hill planning consent when determined]
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares [required before 599 homes occupied on Henley Gate site and 399 homes occupied on CBRE site as stated in the Decision Notices]
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares [required before occupation of 499 homes built on CBRE site as stated in the Decision Notice]
11. Europa Way link road Link road between Sroughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout

As noted above this list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required by SCC from Crest Nicholson before 299 home are occupied on its IGS site (as stated in the Decision Notice). We note that the IGS Highways projects are not secured through S106 Agreements but will be provided by the Developers.

It is not clear whether these projects will be funded separately by SCC outside of the Transport Mitigation Programme or will be funded as part of the Transport Mitigation programme budget. It is unclear what completion dates for these infrastructure projects has been assumed in the modelling work and whether these assumptions are realistic and consistent with the trigger points placed on the IGS developers. Evidence needs to be provided of how each infrastructure project is intended to be funded and when it needs to be completed (as assumed in the modelling work). Currently there is too much ambiguity around these assumptions. We are especially concerned that A1214 junctions' improvements will not have been delivered by 2026 as assumed in the model. Without evidence that funding is available to deliver these 13 projects at the required time the CS is unsound.

As previously mentioned, these projects need to be included in the Infrastructure Tables. If any of the projects are not delivered by the required dates (which need to be identified in the modelling work so they can be tested to be sound) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needs to be provided to the Planning Inspector that funding is in place for these schemes compatible with the required delivery dates which need to be specified.

We note that rail freight from Felixstowe Docks is planned to increase by 50% and the number of trains by 30% with the upgrade of the rail line to Ipswich. This will result in a major increase in the number of closures of Westerfield level crossing and for a longer duration. Westerfield Road is the main access route to the IGS developments (other than the Henley Gate/Crest Nicholson development). Therefore, IBC needs to provide evidence that the SCC modelling assessment has included the impact of the increased closure frequency of Westerfield Road level crossing on traffic for the CS to be sound.

The following Tables show the trip generation reductions assumed in the modelling work, if these are not achieved the modelling is essentially unsound as will be the CS, as the transport network will not be able to cope with the traffic.

Table 5-1 – Trip generation reductions applied to existing road users

Trip type	0-2.5km	2.5km8.5km	8.5km+
Urban-urban	30.00%	15.00%	5.00%
Urban-rural / rural-urban	5.00%	5.00%	5.00%
Rural-rural	0.00%	0.00%	0.00%

Table 5-2 - Trip generation reductions applied to development trip generations

Land Use Type	Development Type	Small	Medium	Large
Residential	Town Centre	10.00%	12.50%	0.00% ²²
Residential	Urban	5.00%	10.00%	10.00%
Residential	Rural	2.00%	2.00%	2.00%
Employment	Town Centre	15.00%	20.00%	20.00%
Employment	Urban	10.00%	15.00%	15.00%
Employment	Rural	3.00%	3.00%	3.00%

We note that “For any development from which trip rates and trip generation was determined from an existing Transport Assessment (i.e. greater than 500 dwellings / jobs), no trip generation reduction was applied as it was assumed a shift to sustainable travel was already accounted for within the Transport Assessment”. We agree with this approach to prevent double counting.

We note that the assumed modal shift rates for the Crest Nicholson and CBRE/Mersea developments in their approved planning applications were 20% (from work, business and other activities, and 30% for travel to the secondary school) and 15% respectively.

Table 6-4 – 2026 Reduction in existing car trips

Sector	ID	AM 2026		PM 2026	
		Origin	Dest	Origin	Dest
	All	-9%	-9%	-10%	-10%
Ipswich Central	800	-12%	-15%	-15%	-15%
Ipswich NW	801	-13%	-13%	-13%	-14%
Ipswich NE	802	-17%	-17%	-17%	-17%
Ipswich SE	803	-15%	-15%	-15%	-16%
Ipswich SW	804	-17%	-14%	-15%	-14%

We note that the reduction in 2036 is very similar.

Tables 6-6 to 6-9 show reduction in trips from new road users for 2way trips in Ipswich these are

²² 0% as there are no such developments

- 12% AM 2026
- 13% PM 2026
- 11% AM 2036
- 12% PM 2036

In Section 6.4 TOTAL TRIP MATRIX REDUCTION Tables 6-10 to 6-17 provides a comparison by vehicle type for the increase in overall county wide traffic for the various 2026/2036 AM/PM assignments with and without demand adjustment compared to the 2016 base. This information needs to be presented for Ipswich in order to properly assess the impacts of the CS and the feasibility of modal shift by vehicle type for Ipswich.

WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

The Demand Reduction Impact for Ipswich is reported in Tables 7 - 14 as follows:

- 28% Reduction in PCU. Hours Delay (AM 2026) – SCC Highway
- 29% Reduction in PCU. Hours Delay (AM 2026) - SCC Highway / SRN interface
- 26% Reduction in PCU. Hours Delay (PM 2026) – SCC Highway
- 23% Reduction in PCU. Hours Delay (PM 2026) - SCC Highway / SRN interface
- 28% Reduction in PCU. Hours Delay (AM 2036) – SCC Highway
- 7% Reduction in PCU. Hours Delay (AM 2036) - SCC Highway / SRN interface
- 30% Reduction in PCU. Hours Delay (PM 2036) – SCC Highway
- 22% Reduction in PCU. Hours Delay (PM 2036) - SCC Highway / SRN interface

These are clearly substantial reductions but there has been no scenario analysis or assessment of how realistic these assumptions and demand reduction impacts are. We believe this level of reduction will be extremely difficult to achieve and that evidence is required to verify this for the CS to be sound.

The AM Peak is defined as 08.00-09.00 and the PM Peak as 17.00-18.00 but road users already experience congestion either side of these times and also around 15.00-16.00 in certain parts of Ipswich due to school traffic/use of pedestrian crossings etc. Experience shows that there are signs of the evening peak running from 15.00-18.30 at certain junctions and road links, e.g. the A1214, to varying degrees. It is not clear how the transport modelling considers the implication of this and the impact of congestion outside of the peak times, this needs to be explored further for the CS to be found sound with regard to Transport. It is particularly important with regard to the potential for road users to alter their journey patterns outside of the model's peak times.

Tables 15, 17, 19 and 21 for SCC Highway in Ipswich including the demand adjustments show

- 5 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2026
- 12 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2026
- 11 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2036
- 42 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2036
- 2 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2026
- 9 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2026
- 12 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2036
- 44 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2036

Previous modelling (for the IGS planning applications) has shown that many junctions and links in Ipswich are already operating at/near capacity at peak times and will continue to get worse without the 15% assumed modal shift. Clearly it will be impossible to achieve 15% modal shift in Ipswich by

2023 (for example) especially as there are no current modal shift projects running in Ipswich. Modelling work needs to show how congested Ipswich roads will be with the additional growth before 2026 with realistic, evidence-based levels of achievable modal shift. By applying a 15% modal shift reduction for the only years modelled, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads at capacity. There is no evidence that the CS is sound in relation to transport proposals in the years up to 2026.

We note that the Results Summaries are only provided with the full demand adjustments without a comparison with zero adjustment (or any levels in between). The impact of additional traffic either side of the AM and PM peaks also needs to be assessed for the CS to be found to be sound.

Section 3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will be unacceptably congested. What the modelling does not show is that these junctions are ALREADY at or near capacity.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that the modelling shows this junction is approaching capacity in 2026.]
- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

3.9.2. V/C results show congestion in the AM and PM peak on Key Street/College St and St Helens Street / Old Foundry Road / Crown Street corridors in Ipswich town centre.

Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads most notably around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound with regard to Transport and Air Quality.

We repeat our concerns that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Rd and Dale Hall Lane as well as Park Rd, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc.

The level of detail of the results provided in this report and published on the IBC website is far less than in the previous 2019 report and as Appendices A-C have not been included in the Evidence Base. These Appendices should be made available publicly prior to the Inspectors examination for analysis and to inform the proceedings.

4.4 IPSWICH MODELLING RESULTS states “4.4.1. Ipswich is highlighted as the location which benefits the most from the ISPA demand adjustments which have been applied. Ipswich experiences the highest proportional decrease in PCU Delay hours and reduction of junctions which show overall V/C issues. 4.4.2. Despite the significant benefits of the demand reductions, there are still various junction approaches along the A1214 corridor around Ipswich are shown to be over or close to capacity in both 2026 and 2036. Junctions in and around the Star Lane gyratory are shown to have capacity issues in both forecast years. Other junctions which show overall capacity issues include Nacton Road / Landseer Road and the St Augustine roundabout (Bucklesham Road / Felixstowe Road).” IBC has not provided any evidence how these issues will be resolved and without doing so the CS is not

sound.

The Traffic modelling clearly needs to show in which year these junctions/routes reach these levels of congestion in order to plan properly for the delivery of the CS. From the results it is clear major new traffic infrastructure is required to resolve congestion on these routes and/or junctions in addition to those 12 projects already identified by SCC and assumed to be implemented.

We note that 4.7 SUMMARY 4.7.1. states *“The modelling detailed within this report is considered to be a robust basis which enables each of the LPAs to be able to test the transport impacts of the proposed housing and job growth within their respective emerging Local Plans.”* We agree that the modelling does test the impacts but do not believe that the modelling work is sufficiently robust to demonstrate that the CS is sound. We note that SCC does not go as far as saying that the CS policies in relation to accessibility and Transport are sound. In our view they are not sound, and IBC needs to provide further robust evidence that they are.

We also note that the traffic modelling excludes any construction and trades traffic involved with any of the new developments and consequently is not sound. Given the scale of development planned in and around Ipswich over the lifetime of the Plan, volumes of construction-related traffic are likely to have a material effect. This is particularly relevant to the roads around the IGS where the bulk of construction-related traffic will result given the proposed 3,500 homes and associated developments. The traffic modelling needs to include all traffic associated with the construction of the proposed new developments in the modelling work to be sound. In Ipswich, the traffic modelling also needs to include the impacts of any major sewage infrastructure works required for the new development, for instance Anglian Water’s proposed strategy is to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Rd, which will require its closure for many months.

If this required traffic infrastructure cannot be delivered in a timely and effective manner before proposed development, then such development cannot be allowed to proceed as it would lead to severe congestion. A mechanism needs to be included in the CS to ensure that this cannot be allowed to happen for it to be sound.

POLICY CS20: KEY TRANSPORT PROPOSALS states that *“The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the Highways England capital funding programme and bidding for other relevant funds.”* This is somewhat misleading as the Mitigation Strategy includes an Implementation Programme (admittedly one that lacks detail and proper cost assessment) which requires substantial funding, including from ISPA authorities, to deliver the required levels of modal shift to deliver Policy CS20 Transport.

Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019

We are disappointed that the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019²³, clearly a key document, has not been included from the IBC

²³ <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>

New Evidence database. As we have only recently come across the document, we have not had sufficient opportunity to examine it in detail prior to the consultation deadline. We believe it is a key document for the Planning Inspector to consider in relation to the soundness of the Transport (and air quality) related aspects of the CS and should be assessed accordingly.

This includes an Implementation Programme for Phase 1 to 2026 with measures up to 2036 to be confirmed. SCC states *“It is anticipated that the phase 2 costs are likely to be greater than phase 1 as these will include linked roads and junctions within the town’s network”*.

Paragraphs 12.18.1 & 2. state that *“The focus of the implementation programme is to deliver mitigation within Ipswich to address the impact of cumulative growth identified in the ISPA planning authorities’ local plans. Recognising that this work will support the Local Transport Plan strategy for Ipswich.”* and *“Modal shift has been identified as the mechanism to mitigate the impacts of this growth. Trip rate adjustments were made within the SCTM model assessment to reflect a reasonable level of modal shift. This approach to trip reduction results, broadly, in a 9% shift to the background traffic and a 7% reduction to the new trips. The implementation programme focuses on measures that will deliver this level of modal shift”*.

However, the modelling work assumes reductions in Ipswich of

- around 15% (Table 6-4) in 2026 in existing car trips (with similar levels in 2036), and
- -12% AM 2026, -13% PM 2026, -11% AM 2036, -12% PM 2036 reduction in trips from new road users for 2way trips in Ipswich (Tables 6-6 to 6-9)

This level of modal shift seems to apply to ISPA as a whole whereas a far greater reduction is required for Ipswich. It is not clear that the full costs of this have been factored in. We question whether the proposed Implementation programme is sufficient to deliver the level of modal shift required in Ipswich assumed in the modelling work to deliver the CS and whether the CS is sound with regards to Transport (and hence air quality).

The evidence provided in Chapter 5 of the achievable levels of modal shift show that the required levels of modal shift for Ipswich are massively higher than the evidence base suggests is achievable or has ever been realised in the UK before. We note that the 2010 Sustrans Smarter Choices Project for Ipswich *engaged with 12, 000 households in a two-year period at a cost of £474,098. Overall it achieved a 11% car with single driver trip modal shift, but this was not sustained due to the lack of long-term engagement* (Paragraph 5.2.13). It is important to understand that these levels of modal shift were achieved in summer months and there was no assessment of the levels in winter, when the number of cyclists reduces due to dark mornings/evenings and inclement weather. As 12,000 households is a sizeable proportion of total Ipswich households, this will make the modal shift targets even harder to achieve as many households will already have been targeted to change their mode of travel.

There are several reasons why these higher levels of modal shift are unlikely to be achieved in Ipswich – some of which are not specific to Ipswich. For example, the assumptions fail to consider that certain categories of workers cannot work from home and will need to use vehicles to in order to work most notably Tradespeople who use tools and carry equipment such as builders/constructors, gas & water engineers, painters, electricians, kitchen & bathroom fitters, tilers, roofers, gardeners, cleaners. The majority of these invariably travel at peak times. Another example is the growing numbers of care workers who support people to live in their homes. Unless SCC changes its school’s policy in relation to choice, many parents will continue to use a vehicle to take and pick up their children from school, especially if parents also work.

Modal shift assumptions also fail to recognise the physical barriers within the town to cycling that have been identified by SCC in its draft LCWIP namely the hills, rail lines and river. Beyond the central core, routes travel uphill to the suburbs. The rail lines restrict route options to the south west of the town and it also severs routes to the north and east. In addition, the river limits north east - south west movements. In particular, many people will struggle to cycle up the steep hills out of Ipswich town. IBC needs to provide the Planning Inspector with sufficient evidence that these barriers can be overcome for the CS to be sound.

It is well known that the number of cyclists reduces in winter due to dark mornings/evenings and inclement weather, yet the modelling assumes the same levels of modal shift will apply throughout the year, which is clearly not going to happen. The modelling and modal shift assumptions are therefore unsound in this respect. IBC needs to provide evidence that extremely high levels of modal shift that have been modelled can be delivered in Ipswich by 2026 for the CS to be sound in respect of Transport and Air Quality.

Paragraph 5.4.5 states that *“Analysis has been undertaken to inform the Suffolk County Council’s Local Cycling and Walking Infrastructure Plan (LCWIP) using DfT approved tools the Walking Route Audit Tool (WRAT) and the Cycling Level of Service (CLOS). This has identified some key links for improvement.”* We are disappointed that this document has also not been added by IBC to its Evidence Base. Please refer to our earlier comments on this.

In order to increase the number of cyclists, people have to feel confident enough and safe to cycle. Yet there is no mention of developing and delivering free road-cycling courses based on national standards²⁴. Without these it will be impossible to increase the number of cyclists to required levels even if there were substantial improvements in safer, dedicated cycling infrastructure.

Paragraph 5.5.1 states that *“Work on the walking and cycling strategy is ongoing. To date schemes have been identified to address existing gaps in the network. However, as part of the ISPA mitigation strategy implementation programme a review of the potential to introduce more ambitious measures would be undertaken, with focus on improving sustainable access to areas of employment.”* There does not appear to be much commitment to providing funding to delivering improved cycling infrastructure. Evidence is required that funding will be available for improved cycling infrastructure, training etc otherwise modal shift targets will not be achieved and the CS is therefore unsound.

In the Infrastructure chapter, Paragraph 9.24.1. states *“The provision of infrastructure needs to be considered for all workstreams in the transport mitigation implementation programme. It is intended that most improvements will manage capacity rather than significantly increase capacity due to physical constraints on the Ipswich highway network.”* This statement gives no confidence that there will be much investment in improving cycling infrastructure to increase capacity. As mentioned earlier it is not clear what infrastructure the Transport Mitigation Strategy. This needs to be made clear to the Planning Inspector for the CS to be sound.

The estimated cost of delivery of mitigation of the lower level of modal shift for ISPA as a whole to 2026, phase 1, is summarised in Table 24, copied below. It is worth noting that modal shift does not happen overnight, as it requires a major change in behaviour, but over a period of many years – this does not seem to have been factored in. To have even the remotest of chances of achieving the extremely high modal shift levels required then investment needs to be made now, especially in

24

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769891/national-standard-cycling.pdf

infrastructure projects which obviously include planning and build times on top of the length of time to deliver behavioural change. The long lead times of infrastructure based behavioural change projects appears not to have been factored in.

Table 24 – Phase 1 cost estimate

Workstream Range of costs to 2026

Monitoring	500,000	700,000
Smarter Choices & QBP project team	2,300,000	2,500,000
Incentives, including bus route subsidy	4,440,000	5,000,000
Parking review	100,000	200,000
Infrastructure	16,000,000	20,000,000
Technology	incl	tbc
Total	23,340,000	28,400,000

We note that Technology costs remain to be confirmed. SCC state *“The use of technology will be considered for all mitigation measures and improvements, especially where it will provide a cost-effective mechanism to deliver the implementation programme and improve modal shift.”* It is clear that Technology costs are likely to be significant. These urgently need to be costed with funding agreed by the relevant authorities for the CS to be found to be sound.

The apportionment of costs by Local Planning Authority is defined in Table 22 below:

Table 22: Trips In/Out of Ipswich

LPA	% trips
Ipswich Borough Council	45
Suffolk Coastal District Council	28
Babergh District Council	14
Mid Suffolk District Council	13

Chapter 11 Funding sources does not inspire confidence that sufficient funding is available, and that Authorities have committed to providing their share. We note that IBC’s FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for modal shift measures. Evidence needs to be provided that sufficient funding is guaranteed, and that each Authority has committed to providing its share of the required funding to deliver the proposed 9% shift to the background traffic and 7% reduction to the new trips. Although this is still far lower than the approximate 15% and 12% reductions the modelling work assumes will happen in Ipswich.

For the CS to be sound an Implementation Programme needs to be included in the CS costed and agreed to be funded by all Authorities that delivers the higher levels of modal shift required to be achieved in Ipswich by 2026. Assurances for funding of the required Phase 2 measures from authorities should also be required for the CS to be sound.

As we have previously stated, there is a single assumption that these levels of modal shift will be delivered, without any scenario modelling e.g. at 25%, 50% and 75% success rates. How will IBC deliver the CS if these unprecedented levels of modal shift are not achieved? Currently Ipswich Borough Council has not provided sufficient evidence that the required levels of modal shift required in Ipswich are achievable or that it has the funding in place to deliver them for the CS to be found to be sound.

cycling in England in July 2019²⁵.

Section 32 recommends that “any revised Cycling and Walking Investment Strategy include targets for getting people to switch from driving to active travel. These targets should be based on the number of journeys made by car, foot or bicycle for journeys of less than 1, 2, 5 and 10 miles.” The Government should set modal shift targets for 2025 and 2040, to align with the targets it sets for increasing levels of walking and cycling. These should be at a level that ensures England meets—at the very least—the Committee on Climate Change’s assumption that there will be a 10% transport modal shift by 2050. Local authorities should be encouraged to set local targets for modal shift as part of their Local Cycling and Walking Infrastructure Plans”. Clearly IBC needs to include modal shift targets in the CS for it to be sound. Whilst we believe that modal switch will be easier in a town than across the UK, it is unbelievable to expect that 15% modal shift can be achieved in 2026. If the Committee on Climate Change is assuming that 10% modal shift targets (over 30 years) are appropriate for the UK in 2050, IBC needs to provide the evidence that it can achieve over 50% higher modal shift in just 6 years (80% lower time frame)? Where is the evidence that IBC can deliver these far higher levels of modal shift in a substantially shorter time frame for the CS to be sound?

Suffolk's Local Transport Plan 2011 - 2031

We also note that SCC’s Suffolk's Local Transport Plan 2011 - 2031²⁶ seems to be the most recent version available. This is split into two parts and outlines SCC’s objectives for transport:

- Suffolk's Local Transport Plan - Part 1 (PDF, 1MB) is a 20-year strategy that highlights the council's long-term ambitions for the transport network.
- Suffolk's Local Transport Plan - Part 2 (PDF, 5MB) is a four-year implementation plan indicating how the council are proposing to address the issues identified within the longer-term transport strategy.

There is no updated version of this in the IBC Local Plan Evidence Base or on the SCC website. A publicly available current Implementation Plan showing how SCC will provide funding to address the key transport issues and the levels of modal shift required to deliver Ipswich Borough Council’s CS does not appear to exist. Without this Ipswich Borough Council is unable to provide sufficient evidence that it can deliver Policy CS20 and therefore the CS is unsound.

As previously stated we are not aware of any major improvements to existing cycle routes on the existing road network in Ipswich since that approval of the current CS. IBC needs to provide evidence of what improvements have been made and are planned for existing road network in order to deliver the high rates of modal shift (and lower trip rates) that the traffic modelling uses. Without the provision of supporting evidence lower modal shift rates and higher trip rates should be adopted in the modelling work.

²⁵ <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/1487.pdf>

²⁶ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

Paragraph 8.220

There is clear evidence that poor air quality does detriment on health. This needs to be amended to read "Air Quality Management Areas are designated in areas where poor air quality will have an effect on people's health". Failure to recognise this undermines the soundness of the Plan.

Policy DM1 Sustainable Construction

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. Policy DM1 needs to be updated to include this commitment and then strengthened to ensure that the CS delivers carbon neutrality of the Council by 2030 for it to be sound. New build homes built by the Council will have to be zero carbon for this to happen and the Council should require other developers to do likewise. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

Policy DM2 Decentralised Renewable or Low Carbon Energy

This policy also needs to be updated and strengthened to incorporate the declaration of a Climate Emergency. The energy requirements of new build homes built by the Council will have to be zero carbon for the Council to become carbon neutral by 2030. The Council should require other developers to do likewise.

Policy DM3 Air Quality

We support the strengthening of DM3 from the previous draft version of the Plan, which was hopelessly weak and ineffective. However there remain major flaws in IBC's approach to improving air quality which mean the CS is unsound.

The Core Strategy Adopted December 2011 Paragraph 9.95 states "*With the levels of growth proposed for the town coupled with the fact the town already has three Air Quality Management Areas it is felt essential that air quality impacts and mitigations are fully addressed.*" Paragraph 8.201 of the current CS states "*There are, in addition, four Air Quality Management Areas (AQMA) within the central area of Ipswich, as a result of pollutants from road traffic.*" There are now five AQMAs in Ipswich. This increase from three to five AQMAs is simply not acceptable given the strong clear evidence of the detrimental impacts on human health. Clearly IBC is not doing enough to improve air quality and must do more for the CS to be sound.

NPPF 181 suggests planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. The CS needs to make a clear commitment to improving air quality in Ipswich and compliance with legally binding air pollution targets for the CS to be sound.

In relation to DM3 Topic Paper: Air Quality, Transport and Green Infrastructure Paragraph 20 states that "*the Council has given consideration to the Government's Clean Air Strategy 2019 and exercised its duty under the Environment Act 1995, and DEFRA's Local Air Quality Management Policy Guidance LAQM.PG16, (4) with the preparation of a draft Air Quality Action Plan (AQAP) and this too has been through a phase of public consultation leading to its (likely) adoption in 2019*". We note

that this has now been adopted without taking any notice of most of the criticisms made by consultees. Paragraph 51 states *“The Local Plan Review Preferred Options sit alongside the Council’s draft Air Quality Action Plan which looks beyond planning at other measures including corporate measures that can be put in place to improve air quality. The Council’s AQ action Plan will be scrutinised by DEFRA, having been subject to public consultation in late 2018.”* IBC needs to confirm that this has happened and provide the results of the examination to help demonstrate the CS is sound.

Defra’s template guidelines for the Air Quality Action Plan require firm, time bounded actions that **will deliver** a reduction in air pollution in the five AQMAs. However, IBC fails to follow Government’s guidelines and chooses to water down Government requirements. Ipswich Borough Council fails to make the required firm commitment in its AQAP to delivering any reduction in air pollution nor does it set out when it will deliver actual improvements in air quality or specifically how it will do this. In our opinion the AQAP is therefore non-compliant with Government requirements and shows a lack of commitment from IBC to improving air quality in Ipswich in breach of its legal duty to do so. This is clearly to the detriment of residents who consequently suffer from higher incidents of poor health and respiratory disease especially in and around the AQMAs. The HRA fails to take into account the non-compliance of the AQAP with Government guidelines.

The WSP Source Apportionment Study (dated June 2018) supported IBC’s AQAP. However, this study is flawed and under-estimates NOx emission levels.

1. The Source Apportionment Study was undertaken for AQMA No.2 (the junction of Crown Street with Fonnereau Road, St. Margaret’s Street and St. Margaret’s Plain) and AQMA No.5 (Matthews Street/Norwich Road between the Civic Drive roundabout and Bramford Road).
2. ANPR cameras were deployed at two roadside count points located on the A1156 in Ipswich to gather detailed information on the local vehicle fleet. Measurements were conducted over a twelve-hour period each day starting at 07:00 on 27th (Friday), 28th (Saturday) and 30th (Monday) April 2018. One of the two ANPRs (in AQMA2) failed at 14.00 Monday (missing the Monday evening peak).
3. Speeds were only measured for the Friday and Saturday and used in the calculation of the vehicle NOx emission rates for these two days. The averages of the hourly measurements made on both days were used to calculate the vehicle NOx emission rates for the 30th April. The report states that traffic speeds were higher on Saturday (somewhat obviously). Other UK traffic flow studies show that Friday traffic volumes in general tend to be lower than other weekdays (as more people like to work from home on a Friday and some sectors tail off ahead of the weekend). Friday evening peak traffic is also lower than other weekdays as people leave work earlier and there are less after-school activities and hence fewer associated traffic movements. We are dismayed that there was no speed measurement between Monday and Thursday, which would have given a more accurate representation of pollution levels. It is also worth noting that more vulnerable schoolchildren are mainly impacted on weekdays for obvious reasons.
4. The report states the obvious in that "Analysis of the NOx emissions shows that they were inversely proportional to vehicle speed, as shown in Figure 7. This means that lower vehicle speeds will give rise to higher emissions, for example during congested periods at peak rush hour time, in addition to the increase in emissions associated with increases in vehicle number." So, the report underestimates Monday's emissions (and hence Tues, Weds, Thurs) and thereby under-estimates what additional measures will be required.
5. At the end of the 2-day measuring period of the two pneumatic strips measuring speeds was found to be loose. The report acknowledges that "this may have caused inconsistencies in the traffic flows and/or directional assignment measured during the traffic survey" i.e. the results are unreliable and hence the report is further flawed.

We note that Paragraph 47 of the Topic Paper states that “Air Quality modelling was completed in 2016 in relation to locations identified for future development under the Ipswich Core Strategy and Policies Development Plan Document Review, and Ipswich Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (the Ipswich CS, 2017)”. We believe that this work assumed the Upper Orwell Crossing project would proceed and as this has been cancelled is therefore obsolete. It excluded all emissions arising from construction including construction traffic and tradespeople journeys. It also failed to assess the multi-site build out of the IGS and air pollution levels in the early years of the IGS build. New Air Quality modelling work needs to address these issues and focus on air quality levels in the first 10 years of development, when they are likely to be at their highest levels (before European vehicle emission standards deliver expected emission reductions).

We note that there is no Air Quality assessment provided as part of this consultation, which is unacceptable (although they are planned). We reserve the right to comment on this when it is available and request that IBC notify and consult with us when this work has been released. Whilst we agree with the areas to be assessed identified in the WSP Screening Report January 2020, we disagree with just the two reference years of 2026 and 2036 being used and argue that an earlier year, such as 2023 (being the midpoint between 2020 and 2026). The reason is that by 2026 tighter vehicle emission standards should be delivering improvements and that it is the early years of the CS period when emissions could be at their most dangerous and greater action required to prevent premature deaths. It is completely pointless using 2036 when considering the 2035 (at the latest) ban on petrol, diesel and hybrid vehicles, which will obviously have a major impact many years before this date. We note that the screening assessment uses the SCTM traffic forecasts, which exclude any form of construction traffic. The air quality assessment needs to include emissions from construction traffic and construction otherwise the assessment and hence the CS will be unsound. We note that the SCTM assumes high levels of modal shift without sufficient evidence that this is achievable. Sensitivity testing of different rates of modal shift is therefore required in the assessment for it to be considered sound.

We support the revised draft Policy DM3 of the CS, which states that “Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.” This has not been done for the IGS development (see below) and needs to be undertaken as a priority before building works be allowed to commence. We also note Paragraph 9.3.5 states that “The AQA should also consider wider cumulative impacts on air quality arising from a number of smaller developments”. In our view that the multi-site build out of the IGS needs to be assessed in a new AQA. The HRA fails to assess the non-compliance of the AQA for the IGS with DM3 and needs to assess this accordingly.

Paragraph 1.2 IBC’s AQAP confirms the use of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments (Appendix 2). However, the IBC Planning Department is currently not implementing the Guidance in the way it needs to be in order to improve Air Quality in Ipswich. This is especially pertinent considering the proposed expansion of Ipswich detailed in the CS. This urgently needs to be corrected for the revised CS to be sound. When assessing the Planning Applications in relation to Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL and Land to the North of the Railway Line and East of Henley Road 16/00608/OUT the Air Quality guidance was ignored in relation to Sections 6.22 and 6.23 (see Appendix 2). No Air Quality Assessment was undertaken for either application that assessed the impact of construction and construction traffic on Air Quality nor was there an Air Quality assessment carried out for the first year of occupation of any of the phased developments,

when there will also be considerable construction traffic as well as substantial additional traffic from the new homes. This raises four key questions that need to be answered by IBC when assessing the soundness of the CS Preferred Options.

- Question 1 Why has the Council chosen to ignore the Guidelines it has adopted and decided not to assess the impact of emissions from construction and associated construction traffic on Air Quality for these IGS sites?
- Question 2 Why has the Council chosen to ignore the adopted Guidelines and chosen not to assess air quality emission for the first year of each phase (when there will also be emissions from the construction of other phases that are being built in parallel)?
- Question 3 How can the Council assess whether these developments “will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA” as required by Section 6.22 of the guidelines?
- Question 4 How can IBC demonstrate compliance with Policy DM3 in the early years of the IGS development, when considering construction traffic and sewage infrastructure works?

In our view the IGS is non-compliant with Policy DM3.

This is particularly pertinent as much of the construction traffic will pass through AQMA 1 and 4 with tradespeople also travelling through AQMAs 2 and 5 as well. Consequently, IBC is currently failing to properly assess the impacts of the construction and related traffic from the IGS development in the early years of the build out on air quality in Ipswich. It has not assessed whether these developments will compromise the current version of the draft Plan, nor the Air Quality Action Plan.

We cannot find any air quality assessment in relation to rail transport or to shipping at the Port of Ipswich, with both forms of transport increasing. This is a major gap in the evidence base that risks rendering the CS unsound especially as ISPA plan to increased capacity on railway lines for freight and passenger traffic (Policy ISPA2 Strategic Infrastructure Priorities f)). AQ assessments are required for:

- The Port of Ipswich (which is included in the Screening assessment study area),
- the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollutant clouds,
- additional freight to and from Port of Felixstowe (Felixstowe-Nuneaton upgrade), we note that rail freight is planned to increase by 50% and the number of trains by 30%, and
- additional freight in relation to the construction of Sizewell C.

We are not arguing against growth, but simply advocating the impacts of air quality need to be properly assessed so that mitigation action can be taken where required. Without this the CS is unsound.

The HRA also fails to consider train and shipping emissions, which need to be included in the HRA especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site. We note that the DfT Port Air Quality Strategy (under the Defra Clean Air Strategy , 14 January 2019) applies to ports with cargo greater than 1million tonnes, which would appear to include the Ipswich Strategic Harbour Authority.

We note that the Council failed to apply for any funding under the Clean Air Fund by the November 2018 deadline for projects that are to commence from March 2019. As the Council has no evidence basis or costings for any of its proposed projects in its AQAP, it will not be eligible for future Clean Air Funding. This clearly begs the question how will IBC fund the projects that it has identified in the AQAP as needed to reduce air pollution? We also note that IBC’s FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for improving air quality despite being the responsible authority for doing so. IBC needs to provide evidence that it will be able to finance and deliver its AQAP for the CS to be sound.

DM8 Natural Environment

Please see our comments under Policy CS4.

DM20: House in Multiple Occupation

We support the new Policy 20 as a pragmatic and sensible response to an increasing issue in Ipswich.

DM21: Transport and Access in New Developments

We strongly object to the removal of the reference to traffic capacity and rights of way in

- a. not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity and highway safety;*

The references to “rights of way or the local road network in respect of traffic capacity” needs to be reinstated as walking and cycling rights of way should not be reduced and as traffic congestion is already a major problem in Ipswich and should not be negatively impacted on by local new developments. The proposed changes conflict with CS5 Improving Accessibility and renders the CS unsound. We support the change in relation to highway safety.

We support the requirement of

- b. not result in a significant detrimental impact on air quality or an Air Quality Management Area and address the appropriate mitigation measures as required through policy DM3*

but note that the IGS development is currently non-compliant as it failed to assess the impacts of the development on air quality in accordance with DM3. A revised assessment of air quality impacts of the IGS is urgently required before building can commence and the revised CS can be found to be sound.

It remains unclear how ‘severe’ and ‘significant’ impacts are defined. These need to be clearly defined in the CS. In the case of air quality, there are maximum legal limits for particulates and nitrous oxides, and it would be appropriate for ‘significant’ to be defined as the legal limit.

Chapter 10 Implementation

Tables 8A and 8B needs to include the required specific junction improvement projects, estimated cost and a date by which they are required to be delivered in accordance with the transport modelling assumptions for the CS to be sound.

Table 8A omits the technology costs that will be required to deliver as stated in Table 24 of the SCC Transport Mitigation Strategy. This needs to be included for the CS to be sound as modal shift targets will not be delivered without new technology.

Table 8A needs to clearly identify that substantial funding will be required for sustainable transport measures in Ipswich and infrastructure to support them after 2026 and that the level of funding will be greater than that required up to 2026 as identified in the SCC Mitigation Strategy.

The Link road through site IPO29 via Europa Way from Bramford Road to Sproughton Road identified in Table 8A has been included in the SCC Modelling assumptions and therefore must be considered as a requirement. If not, the modelling is unsound and needs to be repeated without this link road. We note that in response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road

connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road”.

OBJECTIVE 5: Air quality

We strongly object to the removal of the current Objective to improve Air Quality which in relation to the five AQMAs is a legally binding requirement. We also note that the Planning Inspector specifically requested the inclusion of this indicator in the last review of the current CS. The existing indicator of the “Number of recorded air quality exceedances.” Needs to be retained and reported on. We support the inclusion of an air quality objective but believe this should be to reduce air quality emissions to legally binding limits by a specified date for example within 3 years.

As mentioned previously. It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely.

An Objective of “Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels” does not go far enough. Limiting this to an “aim” provides a massive caveat to the Objective. Also, how will the Council determine that EVERY development has contributed?

OBJECTIVE 6: Transport and connectivity

Given the distinct lack of progress in cycling infrastructure an additional indicator is required to measure improvements, especially in relation to the development of new/improved comprehensive, integrated cycle routes.

As identified above, IBC needs to start taking more positive actions to Improve Accessibility as it is currently non-compliant with CS5. Closer scrutiny of IBCs approach to Improving Accessibility is clearly required and additional Objectives/measures are required to monitor and assess progress on Improving Accessibility in the CS to help ensure IBC comply with CS5 in future.

IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL REPORT Strategic Environmental Assessment and Sustainability Appraisal October 2019

A key problem with the Sustainability Appraisal (SA), Habitats Assessment and Health Impact Assessment, are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. In particular, there is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the project required to deliver the unprecedented levels of modal shift required for the CS to be sound. IBC and SCC's track record in these areas is dire with no evidence provided by IBC that this will change. There has been an increase in AQMAs and traffic with little real improvement in cycling or walking infrastructure and a major deterioration in bus services e.g. the closure of the Norwich Rd Park and Ride Scheme and reduction in rural bus services into Ipswich. The failure of Travel Ipswich (Ipswich Fit for the 21st Century) to deliver modal shift and the Upper Orwell Crossings project illustrate the problems facing IBC.

In our opinion it is too early to fully comment on the Report for several reasons, including:

- No SA of IBCs non-compliance with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
- No SA of IBC's non-adherence to Government Guidelines for IBC's own Air Quality Action Plan in relation to the IGS and the Plan. No consideration that the CS does not comply with legally binding air quality targets.
- No SA of the air quality modelling/assessment of road traffic (as this has not been done yet).
- No SA of the omission of emissions from construction and traffic associated with construction of the IGS.
- No SA of the ability to meet the unprecedented levels of modal shift required for the CS to be sound (as identified in the transport modelling and SCC Transport Mitigation Strategy) and no assessment of what happens if the targets are not achieved.
- No SA of the lack of sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required foul water construction works.
- No SA of air quality or noise assessment in relation to rail transport most notably for the Ipswich Chord and Freight yard, where diesels regularly sit idling, emitting pollution and additional freight to and from Port of Felixstowe,
- No SA of the environmental impacts of the Port of Ipswich.
- No assessment of the potential impacts of increased freight traffic on the IGS pedestrian bridge and Westerfield rail crossing (including impacts on traffic delays).
- No SA of the decision to destroy the Green Rim by building homes on the Humber Doucy Lane part and re-designating it as Green Trails.
- The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.
- No SA of the alternative of using land reserved for Retail and Car Parking in the town centre, which we believe is surplus to requirements, instead of building on Humber Doucy Lane.
- No SA of the omission of the incorporation of IBC's declaration of Climate Emergency into the Plan.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. Until the SA addresses these issues the CS cannot be deemed sound. We reserve the right to comment on the SA as it is developed.

Habitats Regulation Assessment (HRA)

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment.

The HRA is currently incomplete and needs to address the following impacts of :

1. The proposed re-designation of the Green Rim.
2. The new sewage infrastructure that will be required to deliver the housing and employment targets.
3. The required traffic infrastructure identified by the traffic modelling to improve the road network to allow the sustainable delivery of the CS (summarised above).
4. The non-compliance of the IGS AQA with DM3.
5. Emissions from rail and shipping.

If no such assessments are included in the HRA then the HRA needs to explain why they have been omitted.

IBC's response²⁷ to the Habitat Regulation Assessment (HRA) recommendations in relation to Paragraph 1.29 is not acceptable. This recommendation states *"In order to make ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected."* The CS needs to be strengthened to ensure compliance with this recommendation especially as IBC's proposal to re-designate the Green Rim (which has not been assessed by the HRA) is clearly detrimental to this requirement.

It also needs to assess whether the lack of S106 payments for RAMs mitigation from the two IGS sites that received outline planning permission in February 2020 is acceptable as discussed earlier.

Health Impact Assessment

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment. The Health Impact Assessment fails to take into full account the removal of the Ipswich Green Rim, the non-compliance with legally binding air quality targets, emissions from construction, port and rail activities and the failure to include recognition of the Climate Emergency into the Plan.

Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group²⁸

²⁷https://www.ipswich.gov.uk/sites/default/files/response_by_ibc_to_the_habitat_regulation_assessment_jan_2020_0.pdf

²⁸ The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its members and other residents who have authorised the NFPG to represent them. A list can be supplied on request.

Appendix 1 Evidence that the Green Rim should not be reclassified as Green Trails

- Ipswich Local Plan November 1997

This makes specific reference to 9 green corridors (A-I) in Chapter 3. Paragraph 3.12 states *“These green spaces offer the opportunity to form corridors linking the inner parts of the Town with the surrounding countryside, visually and by providing access on foot or by cycle. These corridors are indicated on Plan No 1.”*

NE2 also states that *“The protection of the landscape quality and character of the countryside *including the Area of Outstanding Natural Beauty (AONB) will be a prime consideration and proposals for irreversible development which is not required for the efficient operation of agriculture, forestry and recreation will not be permitted in the countryside as indicated on the Proposals Map unless there is an overriding case for a rural location.”*

It is clear it is the intention that the green corridors will provide access on foot or by cycle to the surrounding countryside and it is this countryside that was intended to form the green rim of Ipswich.

- Ipswich Core Strategy and Policies Development Plan Document December 2011

Chapter 7: The Key Diagram references (v) The green corridor and green rim approach to strategic green infrastructure (Policy CS16); The green rim almost completely covers the Ipswich Borough Council boundaries, which essentially reflects the countryside in the 1997 Proposals Map.

POLICY CS16: GREEN INFRASTRUCTURE, SPORT AND RECREATION Paragraph 8.175 states *“As the Borough grows, it is essential to protect, enhance and extend the network of open spaces, green corridors, and sports and recreation facilities. This is important in order to: allow people access to green space and nature; strengthen ecological networks that enable wildlife to migrate more easily around the town; link inner and outer parts of the Borough by providing walking and cycling routes;”*

*It will do this by [a number of means including]
f. working with partners to improve green infrastructure provision and link radial green corridors with a publicly accessible green rim around Ipswich;”*

It is clear the December 2011 Plan continues the concept of the green corridors providing walking and cycling routes to access the green rim and that the green rim was not intended for this purpose. We note that there remain 9 green corridors in the 2011 Plan as there were in the 1997 plan.

The green rim on the 2011 Key Diagram (pg 30) is very much larger than that in the current Key Diagram and clearly illustrates that the concept of the green rim is to protect the countryside on the perimeter of Ipswich Borough. It is also clear the Green Rim has been decimated beyond its original intention.

- Ipswich Core Strategy and Policies Development Plan Document February 2017

Diagram 3 of the Plan (pg 24) and the associated Plan 6

https://www.ipswich.gov.uk/sites/default/files/plan_6_green_corridors_-

[adopted feb 2017.pdf](#) shows that 9 green corridors remain and illustrates the green rim (which has shrunk from the previous Plan).

CS 16 states that *“The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:*

g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green rim around Ipswich;”

This continues the concept that it is the green corridors that provide the links to the green rim.

- Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council
Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters in the Ipswich Strategic Planning Area Version 3 – December 2018

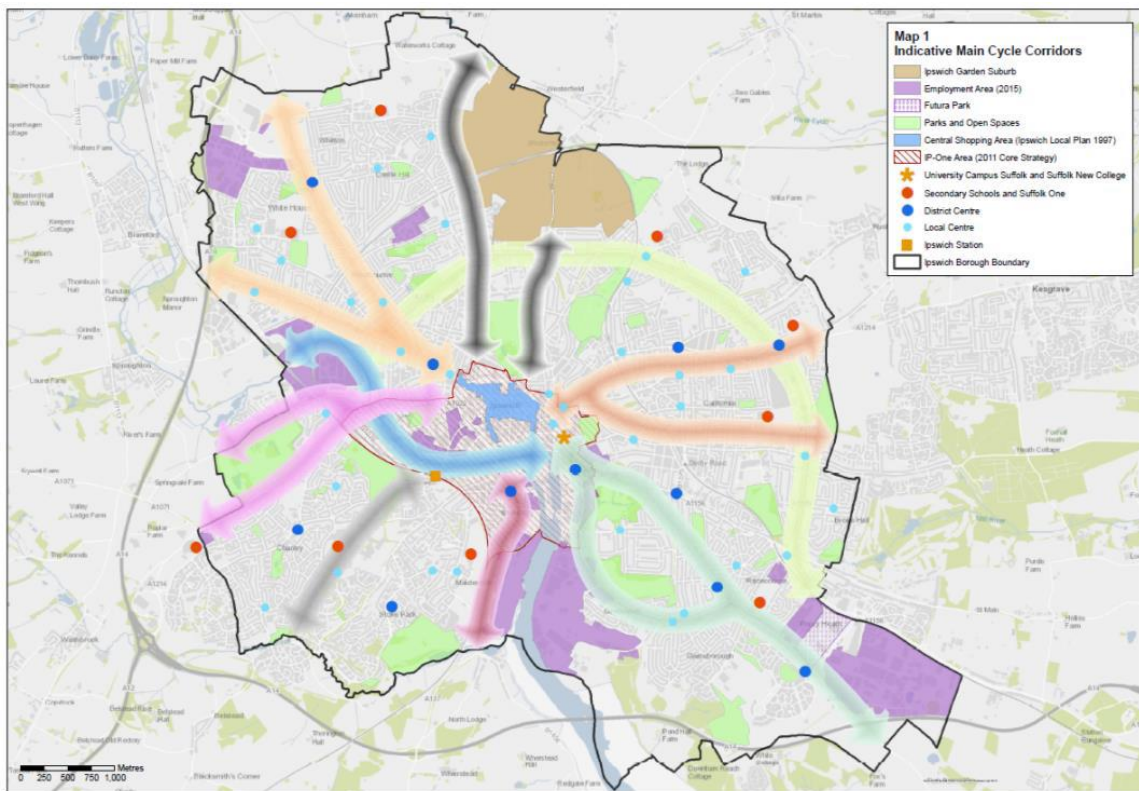
Section I Annex – Cross Boundary Infrastructure Requirements - Green Infrastructure pg 25 references the Infrastructure requirement for *“Creation of ‘green rim’ around Ipswich”* in accordance with the Update to the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area (August 2015), Ipswich Borough Council Local Plan Review Preferred Options (November 2018) policy ISPA4 Cross Boundary Working to Deliver Sites and CS16 green Policies ISPA4 and SCLP12.24 require development to contribute to the creation of the ‘green rim’. This is clearly categorised as “Green Infrastructure” and not as “Transport Infrastructure”.

- Comparison of cycle routes and the proposed green trails in the Key Diagram
When cross-referencing the current Key Diagram and green trails with the Ipswich cycle map <http://www.greensuffolk.org/assets/Travel-Plans/Documents/Cycling/IpswichCycleMap.pdf> we have the following observations:

1. A green trail clearly suggests a “route”, but the Key Diagram map shows a green area.
2. Under no stretch of imagination would one call a road used by motor vehicles a green trail.
3. No cycle route through the Chantry Park part of the green trail.
4. No cycle route at all through the Humber Doucy Lane stretch of the green trail.
5. No cycle route through the Purdis Heath part of the green trail.
6. No cycle route through the Rushmere Heath part of the green trail.
7. No green cycle route other than Thurleston Lane in the green trail above Whitton
8. No cycle route in the green trail between Ipswich and Westerfield.
9. No cycle routes through the Pipers Vale and Ravenswood other than a small dead-end stretch in the former and a looped cycle path around Ravenswood housing estate, which is hardly green.

- The Ipswich Cycling Strategy Supplementary Planning Document March 2016

This does not identify any of the Green Rim as cycling corridors as summarised in Map 1 Paragraph 6.12 reflects the Key Diagram. This clearly shows that the Green Rim was never intended as cycle routes and should not be reclassified as Green Trails.



- Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018²⁹ Jointly commissioned by Ipswich BC and neighbouring authorities

Pg 11 refers to the Green Rim in the context of the Ipswich Key Diagram stating “this green rim is intended to provide an ecological corridor and a recreational resource”. There is no reference to “trails” and if this was the intention one would have expected IBC to correct this reference as it is fundamental to the report.

²⁹ <https://www.ipswich.gov.uk/sites/default/files/settlement-sensitivity-assessment-july2018.pdf>

Appendix 2 Extracts from The Institute of Air Quality Management and Environmental Protection UK guidance

6.22 The report prepared detailing the results of the assessment should contain the following information (but not necessarily in this order):

j. Description of construction phase impacts. These impacts will relate primarily to dust emissions, which give rise to dust soiling and elevated PM10 concentrations, although construction plant and vehicles may need assessment. The assessment should take into consideration the likely activities, duration and mitigation measures to be implemented. The distance over which impacts are likely to occur and an estimate of the number of properties likely to be affected should be included. This assessment should follow the guidance set out by the IAQM³¹

m. Summary of the assessment results. This should include:

- Impacts during the construction phase of the development (usually on dust soiling and PM10 concentrations);
- Any exceedances of the air quality objectives arising as a result of the development, or any worsening of a current breach (including the geographical extent);
- Whether the development will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA.

6.23 Most assessments are carried out for the first year of the proposed development's use, as this will generally represent the worst-case scenario. This is because background concentrations of some pollutants are predicted to decline in future years, as emissions from new vehicles are reduced by the progressive introduction of higher emissions standards. Where development is phased, however, it may also be appropriate to assess conditions for the opening years of each new phase.