



## NORTHERN FRINGE PROTECTION GROUP

### Safeguarding the Character of Ipswich

Please find the attached comments on the Proposed Main Modifications to the Core Strategy and Policies Development Plan Document. Whilst we still have concerns on other parts of the Core Strategy, we have limited our comments to sections on Air Quality, as we strongly believe that our concerns have not been adequately addressed in the main modifications proposed by IBC. In specific relation to air quality issues, we do not believe that the Plan has been positively prepared. In our view, the following main modifications are not sufficient for the Plan to be found to be sound and will not result in legal compliance. We believe that further modifications are justified and required for the Plan to be effective and consistent with national policy in relation to air quality.

For ease of reference the following text in black is taken from the proposed Main Modification version of the Plan and our comments are provided in blue.

**MM3 Paragraph 6.8** Amend paragraph 6.8, Objective 5 to read as follows: ‘5. AIR QUALITY AND CLIMATE CHANGE - Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.’

*NPPF Paragraph 186 states that “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. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement ... ..”*

The proposed modification still fails to include an objective for AIR QUALITY “to contribute towards compliance with relevant limit values” as required under the NPPF (and legally binding air quality legislation). The proposed modification is therefore neither effective, nor consistent with national policy. We suggest that IBC should ensure compliance with legally binding targets by 2024, which would be 16 years since the publication of IBC’s first Air Quality Action Plan in 2008<sup>1</sup> and consistent with IBC’s current Air Quality Action Plan 2019-2024. The AQAP should have been designed to ensure compliance with legally binding limit values for it to have been approved by Councillors as fit for purpose; so there is no reason why 2024 should not be included in the Plan. If 2024 is not accepted by IBC, then it clearly illustrates that the current AQAP is inadequate and needs to be urgently revised to ensure compliance.

Therefore MM3 needs to be further amended to read:

*“Every development should contribute to the aim of compliance with relevant air quality limit values for pollutants in Ipswich by 2024 (by eradicating AQMAs)”.*

*This is justified as it would help prevent further un-necessary deaths and instances of respiratory illness in Ipswich.*

**MM77 Paragraph 9.3.1** Amend Paragraph 9.3.1 to read as follows: ‘The focus of Policy DM3 is to mitigate the impact of development on air quality and to ensure exposure to poor air quality is

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<sup>1</sup> [Ipswich Air Quality Action Plan 2008](#)

reduced in the Borough, to contribute towards achieving compliance with air quality limit values for pollutants.

The proposed modification MM77 is insufficient and needs to include a compliance date to be effective and consistent with national policy. We advocate that this is set at end 2023. Without a target date Policy DM3 cannot possibly be effective. We note that paragraph a) repeated below references that Development proposals should not “delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits”. Consequently a date for compliance must be included in the Plan, otherwise how will compliance with this requirement be assessed?

MM77 therefore should be amended to read

“... .. to contribute towards achieving compliance with air quality limit values for pollutants by end 2023.”

#### **POLICY DM3: Air Quality**

The Council will ensure that the impact of development on air quality is mitigated and ensure that proposals do not negatively impact on existing air quality levels in the Borough. The Council will take into account the impact of air quality when assessing development proposals, through consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Development proposals should not: a) create any new areas that exceed air quality limits or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; b) reduce air quality benefits that result from the Borough Council’s activities to improve air quality; and c) create unacceptable risk of exposure to high levels of poor air quality, for example, through having a negative impact on an existing AQMA. An Air Quality Assessment (AQA) will be required where development proposals are likely to expose residents to unacceptable levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact. 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. Development should be consistent with the actions identified in the Council’s Air Quality Action Plan, where appropriate.

**MM99 Policy DM21** Amend Policy DM21: Transport and Access to New Developments, to read as follows: ‘POLICY DM21: Transport and Access to New Developments To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:

b. not result in a significant detrimental impact on air quality ~~or an Air Quality Management Area~~ and ~~shall~~ address the appropriate mitigation measures as required ~~through~~ in accordance with ~~Policy~~ DM3.

To be consistent with Policy DM3, MM99 also needs to make it clear that there should not be any “negative impact” on, and around, existing AQMAs from new development or the exceedances of legally binding limit values anywhere in Ipswich. We also note that there is no definition of “significant” and suggest that this needs to be deleted. To be effective and consistent with national policy MM99 needs to be revised and we suggest the following, which is more consistent with Policy DM3.

“shall:

b. not result in:

1. any detrimental impact on air quality in and around the existing AQMAs,
2. the creation of any new AQMAs,
3. a detrimental impact on air quality elsewhere in Ipswich that is likely to result in a negative impact on health.”

**MM143 Objective 5** Amend Objective 5: Air Quality, to read as follows: ‘OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE

Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.

INDICATOR(S)

~~Per Capita CO2 emissions in the local authority area.~~

Local authority CO2 emissions. Local authority air pollution data.

Number and extent of designated AQMAs.

NOx concentrations measured through AQMA data and DEFRA returns.

TARGETS

~~To reduce the level of identified air pollutants in the National Air Quality Strategy.~~

To reduce the extent of AQMAs by 2036 in accordance with the corporate Air Quality Action Plan Review (Council Target).

The reference to “the corporate Air Quality Action Plan Review (Council Target)” should be removed as a) this Review is not in the public domain and b) has not been agreed so it is therefore not yet a Council target. We strongly object to the proposed 2036 date as this will result in further unnecessary deaths and cases of respiratory illness in Ipswich. It is clearly not effective, justified, or consistent with national policy to continue to allow illegal air quality levels in Ipswich for another 25 years. It clearly illustrates that IBC is not taking its air quality duties seriously.

We note that since its first Air Quality Action Plan in 2008, IBC has failed to improve air quality in Ipswich and the number of AQMAs has been increased from the initial three AQMAs.

We also note that this target could be achieved by reducing just one of existing AQMAs by just 1m<sup>2</sup>.

The Executive Summary of IBC’s current Air Quality Action 2019-2024 states that “*Ipswich Borough Council is committed to reducing the exposure of people in Ipswich to poor air quality in order to improve health.*” This target is therefore inconsistent with IBC’s own AQAP as it illustrates no real commitment to reducing the exposure of people in Ipswich to poor air quality. It is clearly worthless and needs to be replaced with a target that will ensure compliance with UK air quality legislation and NPPF paragraph 186. MM143 should be revised to read

OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE

Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels and to contribute towards achieving compliance with air quality limit values for pollutants by 2024.”.

INDICATOR(S)

Local authority CO2 emissions. Local authority air pollution data.

Number and extent of designated AQMAs.

NOx and particulate concentrations measured through AQMA data and DEFRA returns.

TARGETS

To eradicate all AQMAs and comply with UK limit values for air pollutants by 2024.

Unfortunately, as currently drafted, this illustrates the lack of ambition the Council has in improving air quality in Ipswich. It would also appear that the Council has little intention of trying to eradicate illegal air pollution any time soon and demonstrates why the Local Plan must impose a target on the

Council to comply with legally binding UK air quality targets for it to be sound, effective, and consistent with national policy.

**Other modifications required for correction purposes**

In addition, the following paragraphs and Plan 7 need to be corrected as IBC now has four declared AQMAs following The Executive meeting on 10<sup>th</sup> August 2021 (see draft minutes at [Executive draft minutes 10th August 2021](#) ).

**8.241** There are particular concerns about highway capacity within the Star Lane area of Ipswich Town Centre, as this impacts on east-west vehicle movements and pedestrian connectivity between the central shopping area and the Waterfront. These capacity implications are closely linked to issues associated with the wider transport network – including the A14 and the Orwell Bridge. There are, in addition, five Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic. Air Quality Management Areas are designated in areas where poor air quality may have an effect on people’s health.

**9.3.2** Ipswich has 5 Air Quality Management Areas (AQMAs) and therefore developers must give careful consideration to the air quality impacts of their proposed development. Plan 7 identifies the 5 AQMAs in Ipswich.

On behalf of the Northern Fringe Protection Group  
17<sup>th</sup> September 2021