



Save Our country Spaces 23/09/21

SOCS feel that the main modifications and corrections fail to make meet the Sustainability tests required to make the plan Sound, Compliant and Justified.

SOCS draw attention to an omission [Ipswich Borough Council Local Plan Review 2018-2036 Examination](#)

During the Local Plan Enquiry in Public, I requested the following A4 page page to be attached to SOCs addendum; for it to be included and uploaded.
The Planning Inspectors agreed to this.
It was however this was never done.

So this oversight needs correcting and it needs to be uploaded as part of the modification.
<https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/k13.pdf>

IBC Local Plan Examination: Response to Northern Fringe Protection Group & Save Our Country Spaces Comments on Sustainability Appraisal 11/12/20

SOCS finds it tragic and ironic that the driving force for the Public Health England Air Quality Toolkit- Head of NHS Public Health England, DR Paul Cosford died in April 2021 at the age of 58 from lung cancer. He was a non smoker and keen cyclist who attributed his illness in part to air pollution exposure.



Save Our Country Spaces (SOCS) understanding of Public Health requirements which include assessment of adverse impacts on public health from poor air quality. Public Health should give input on Planning Matters involving health risks before this application can be determined. (as amended April 2017)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213009/Public-health-role-of-local-authorities-factsheet.pdf

Role of the Director of Public Health in Local Authorities

From: [Department of Health](#) Published: 5 October 2012 Applies to: England
Describes both the statutory and non-statutory elements of the role of Director of Public Health

Part 1 of this guidance will be republished and updated in April 2013 under section 73A(7) of the NHS Act 2006 (inserted by section 30 of the Health and Social Care Act 2012) as guidance that local authorities must have regard to.

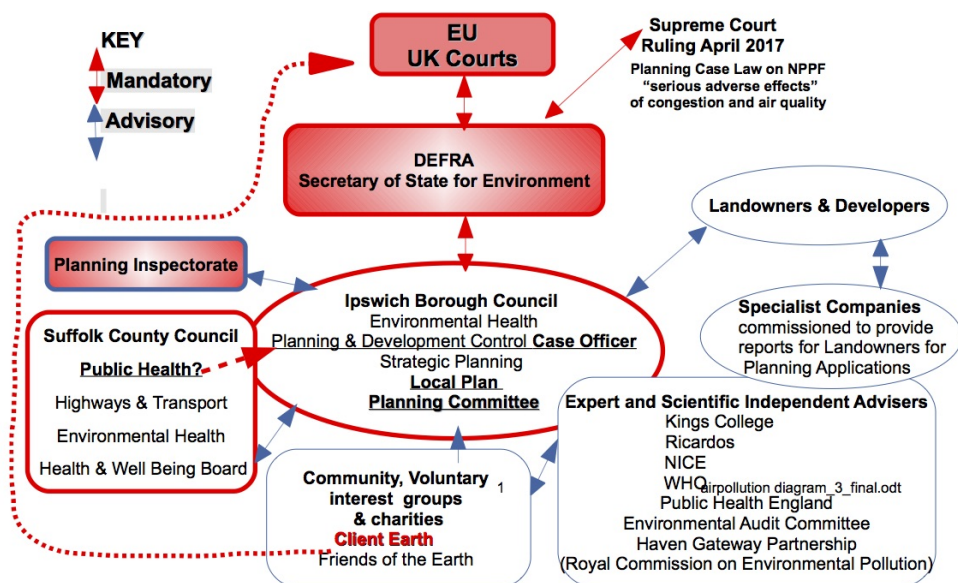
1. The DPH is a statutory chief officer of their authority and the principal adviser on all health matters to elected members and officers, with a leadership role spanning all three domains of public health: health improvement, health protection and healthcare public health.
2. 1.5 Local authorities must take the action to improve public health that they decide is appropriate – it is not the job of central government to look over their shoulders and offer unnecessary advice. Nevertheless, the statutory basis of the DPH role, its transfer to local government and the involvement of the Secretary of State mean that there is value in clear, informative guidance that establishes a shared understanding of how this vital component of the reformed system should work.

Additional considerations include ;

- **Public Health Outcomes Framework – this covers particulate matter especially pm 2.5mg** <http://www.phoutcomes.info/search/air%20quality>
- **Health Risk Impact Assessments**

Hierarchy of Mandate, Responsibility and Custodianship of Public Health to protect from risks from poor Air Quality in relation to planning determination and decision making.

The government has indicated that the decision to leave the EU will not affect the UK's commitment to meeting air quality targets.



<https://www.independent.co.uk/news/health/lung-cancer-non-smoker-air-pollution-cigarettes-public-health-england-a8886681.html>

Pollution contributing to 'thousands of lung cancers deaths in non-smokers', experts warn.

'For too long having lung cancer has only been thought of as a smoking related disease,' say Public Health England researchers calling for indoor and outdoor pollution risks to be considered seriously'

He was formerly Director of Public Health for the East of England Strategic Health Authority.

The follow needs referencing I regard to Air Quality.

Published 17 March 2020 - Last updated 26 March 2021

- <https://www.gov.uk/government/publications/assess-the-impact-of-air-quality>
- [Air quality appraisal: impact pathways approach](#)

This especially the Public Health England Air Quality Toolkit.

- <https://laqm.defra.gov.uk/assets/63091defraairqualityguide9web.pdf>
- **Air Quality A Briefing for Directors of Public Health March 2017**

The following would be useful to reference too;

- <http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=18580>

SOCS fully support the ananalysis of the North Fringe Development Group submission which they have permission to include as part of SOCS response.

Developing communication methods for localised air quality and health impact information - AQ1010

Description

There is a need to more effectively communicate the health impacts of air pollution. Current air pollutant concentrations – though low by historic levels – are believed to hasten the deaths of tens of thousands of people in the UK from particulates, with an order of magnitude greater impact on morbidity. **Studies for DH in developing the Public Health Outcomes Framework indicate that PM2.5 is the sixth most important lever to improve public health in the UK.** (Epidemiologists continue to improve their understanding of the effects of NO2 and other pollutants, so their health impacts may yet be quantified.)

There is a clear public health case for local action on air quality. Unitary and upper tier local authorities now have a duty to take steps to improve the health of people in their local areas. This new duty, together with the inclusion of the PM2.5 indicator in the Public Health Outcomes Framework, creates an excellent opportunity for that case to be made more effectively within local authorities and communities. Specifically, the reform of public health services means that Directors of Public Health (DPHs) have the potential to become key local champions of air quality improvement, by informing and influencing their peers in local transport, planning, sustainability and other departments, and by getting the message out to the general public.

To realise the potential for DPHs to act as local champions of air quality improvement, the Authority wishes to develop a communications Toolkit (with associated recommendations). The Toolkit has an important enabling role to play in a deeper cultural shift in the approaches taken by Local Authorities to air quality reduction: from a passive regulatory stance to one of active stakeholder engagement.

Objective

The aim of this project is to develop a set of recommendations and a communications Toolkit that can be used effectively to communicate the health effects of air pollution at a local level so that cost-effective local action on air pollution reduction is taken.

It must:

- enable the Authority and key national partners to raise awareness among DPHs of the health impacts of air pollution, and ensure that this evidence is properly used in local decision-making and prioritisation;
- enable and encourage DPHs to repeat this process with other local decision-makers, so they become champions within Local Authorities for air quality actions, such as those in Air Quality Action Plans
- enable and encourage DPHs and other local decision-makers to communicate the health impacts of air pollution to the general public (drawing on existing communications channels and expertise), to ensure acceptance of air quality related measures and promote behaviour change where necessary.

Project Documents

- **FRP - Final Report** : [AQ1010 Final Project Report](#) (555k)
- **OTH - Other** : [Directors of Public Health Air Quality Toolkit](#) (1085k)
- **TRP - Technical Report** : [AQ1010 Public Workshops Report](#) (364k)

Time-Scale and Cost

From: 2013

To: 2014

Contractor / Funded Organisations

[Par Hill Research Ltd](#)

Keywords

[Environmental policy](#)

Fields of Study

[Air Quality](#)

SOCS & NORTHERN FRINGE PROTECTION GROUP (with permission from NFPG)

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; 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

¹ Ipswich Air Quality Action Plan 2008

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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 Ppolicy 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 not 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:

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1. 2. 3.

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 1m². 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

any detrimental impact on air quality in and around the existing AQMAs,

the creation of any new AQMAs,

a detrimental impact on air quality elsewhere in Ipswich that is likely to result in a

negative impact on health.”

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

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 17th September 2021

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 10th August 2021 (see draft minutes at **Executive draft minutes 10th August 2021**).

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