



# NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

## Ipswich Draft Local Plan Examination Statement On STAGE 2 - MATTERS AND QUESTIONS

This document refers to the second part of Stage 2 concerning Matters 5&9.

### Matter 5 – Ipswich Garden Suburb

#### Policy CS10 and CS Table 8b

**Q5.1** *Having particular regard to the following are the policies and proposals for the Ipswich Garden Suburb (IGS) soundly-based?*

**Unsound.**

- Traffic and transport - **Unsound**

The only traffic assessment showing the 'before' and forecast 'after' effects of the development of the entire IGS is that submitted by CBRE/Mersea Homes as part of their planning application<sup>1</sup>. (Note that the recent Traffic Assessment discussed under Matter 9 includes the IGS development but does not specifically assess the impact of the development. Furthermore, we have severe misgivings about this latest report and the underlying assumptions particularly on modal shift, as discussed below). In their response to the IGS planning application<sup>2</sup> Suffolk County Council endorsed the views of their consultants WSP who stated *“Even with the lack of information and methodical flaws, the results indicate that the development has a severe impact on the network performance and travel times”*

Mitigating proposals from SCC/IBC assume a modal shift onto public transport to the town centre, cycling and walking and also controlling site access through traffic lights linked into the Urban Traffic Management Control System. Regarding the latter, the intention is to restrict vehicles leaving the IGS if neighbouring roads are experiencing significant congestion. This approach might show some benefit for the morning peak traffic but will have no benefit for the evening peak of returning traffic, which the CBRE/Mersea Homes Traffic Assessment found to be the worst. It will also raise much dissatisfaction with the IGS residents when they are prevented/delayed from leaving site in the mornings and whether this was clarified at the time of the property sale.

The modal shift assumptions appear unrealistic as the key employment growth sites are not in the town centre. We note that no real study has been conducted into new bus services for the site including financing and long-term viability.

Unfortunately the north of Ipswich is poorly served by road infrastructure especially to sites of employment growth and to Ipswich Station. The IGS is simply in the wrong location. IBC should have been working more closely with neighbouring Local Authorities to locate homes nearer to identified employment growth sites. This would have offered a more sustainable

<sup>1</sup> Planning Application IP/14/00638

<sup>2</sup> This document was incorporated in the SCC response to IP/14/00638 Paragraph 48, Suffolk County Council Cabinet Meeting 11<sup>th</sup> November 2014 Concerning The Ipswich Northern Fringe

solution. To improve soundness the IGS should not go ahead in its current form without the provision of a northern relief road or northern bypass. This is currently under study by SCC. In addition Westerfield railway station services to Ipswich Station could be upgraded with adequate parking provided to encourage north Ipswich rail commuters not to drive through town to Ipswich Station. This is recognised in the IGS SPD. However, Network Rail's focus is upon increasing freight services from Felixstowe docks, passenger services have been downgraded and there is no indication that additional commuter services will be created, quite the reverse.

The draft Local Plan proposes to allocate the entire IGS site. This 'big bang' approach will result in multi-site development which once started will have to continue to its conclusion. If mid-way through it becomes clear that traffic congestion is severe and/or air quality becomes much more of a problem there appears no way to stop the development. **To improve soundness a phased approach should be used as agreed by the previous Government Inspector in the adopted Core Strategy.**

- Other infrastructure and services - **Unsound**

If the IGS goes ahead, Ipswich residents want to ensure it has excellent infrastructure, is an attractive development, fits in with the neighbourhood, is sustainable and the negative aspects such as traffic congestion and air quality are minimised. The community groups have worked with IBC to produce the IGS Masterplan (SPD) and there is much to like in the infrastructure designed into the development. IBC have been conducting viability studies into the infrastructure with consultants Mott MacDonald and it is important that what is proposed in the SPD is not compromised. There are still key unknown costs, e.g. sewage infrastructure, and disagreements on bridges over the railway line including the resolution of 'ransom strips'. So far agreement has not been reached and IBC have agreed to give a positional statement at the hearings.

**For soundness an agreement at least in principle on IGS infrastructure between IBC and the developers needs to happen so at least some form of clarity of what will be provided will be given and the viability established.**

**Country Park - To safeguard the Stour and Orwell Estuary Special Protection Area and to improve soundness of the draft local Plan, an effective delivery mechanism and timescales need to be determined for the IGS Country Park**

Secondary School - The IGS Master Plan allocates the school to the Red House sector, which has received little consideration compared with the other 2 sectors and where outline plans have yet to emerge. There is a serious risk that the required new secondary school cannot be delivered in time (2021) due to delays by the various parties in reaching agreement on the IGS infrastructure and delays associated with the proposed IGS development. The IGS SPD refers to the need to identify a fall back site on the IGS should the Red House secondary school site not materialise but we are unaware of any proposals for this. **For soundness an alternative plan 'B' needs to be created for the secondary school.**

- Air Quality – **Potentially Unsound**

Ipswich already has 4 AQMAs where Nox exceeds European safety standards and IBC is considering creating the whole of the central area as an AQMA. The IGS will undoubtedly impact on these areas particularly Chevallier Street, St Margaret's Plain, St Helen's Street, and Civic Drive. In addition we note from Fig 3-5 A&C<sup>3</sup> that relates to the vicinity of the IGS development, that there will be junction capacity issues where Valley Road intersects with Norwich Road, Henley Road, Westerfield Road and Tuddenham Road with expected high levels of Nox. There are SCC proposals to replace Westerfield and Tuddenham Road roundabouts with traffic lights and to insert a Toucan Crossing between Henley Road and Westerfield Road. We consider these highway changes are likely to worsen air quality. We

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<sup>3</sup> Air Quality Report 27<sup>th</sup> May 2016 WSP/Parsons Brinkerhoff IBC Core Document Library PSCD19

would not normally have expected air quality issues to arise on the IGS development itself. However, with the SCC proposal to prevent/restrict traffic leaving the IGS site depending on the congestion of surrounding roads the onsite queuing traffic may give rise to high levels of pollutants. This needs to be assessed.

**To be sound the IGS should be a phased development, the affects on AQ monitored and if the exceedances become serious future phases can be halted.**

- Fresh and Waste Water and Flooding – **Unsound (Wastewater)**

We have received reassurances from IBC that freshwater supply and potential flooding issues can be resolved. Crest Nicholson has stated their intention<sup>4</sup> to do more than planning policy dictates by reducing the existing flooding issues at Lower Road. This is to be welcomed especially due to the June 2016 flooding.

Sewage treatment has long been recognised as an issue for Ipswich as reported in the 2009 Haven Gateway Study<sup>5</sup>. Paragraph 6.6.2 refers to sewage treatment for the North of Ipswich and it states 'Wastewater treatment will be provided by the Cliff Quay STW, which again has been discussed in Section 6.4. However, wastewater collection and transport of wastewater to the works is seen as a potential issue within the Ipswich area.' IBC have swept this issue under the carpet and seven years on, despite Anglian Water re-iterating the position<sup>6</sup> in February 2013, we are still awaiting a solution to the North of Ipswich wastewater transport infrastructure. This could undermine the viability of the IGS development if a new pipeline through Ipswich to the Cliff Quay Sewage Treatment Works is required. Crest Nicholson expect an IGS wide report on Foul Water to be published in the Autumn 2016. This is obviously a very serious issue else a solution would have emerged long ago.

The viability of the IGS development and timescales will depend upon a cost effective solution being found to the north of Ipswich sewage pipeline problem and consequently the soundness of the Local Plan. **Until Anglian Water produce a costed proposed solution the Local Plan is unsound. In view of the importance of this subject it is recommended for inclusion in Infrastructure Table 8B**

- Landscape and nature conservation – **sound**
- Realistic delivery during plan period – **unsound**

The project has effectively been stalled for the best part of 2 years mainly over:

- Infrastructure provision, including sewage pipeline capacity, viability and agreement between the developers and IBC
- Transport Assessment and mitigation measures.

It is unclear when these issues can be resolved which undermines the delivery plan. **To improve soundness the plan should be deferred pending the output of the Anglian Water wastewater study and a satisfactory conclusion to the issues raised below on the WSP/Parsons Brinkerhoff Traffic Assessment and Air Quality Assessment.**

- The flexibility of the policy arrangements – no comment

**Q5.2** *Does the Sustainability Appraisal adequately assess the likely effects of the Ipswich Garden Suburb and test it against reasonable alternatives. If you contend the Appraisal is inadequate what further work should be undertaken?*

**Unsound.**

We maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough. As an example, the cumulative and

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<sup>4</sup> Henley Gate (IGS) Community Update June 2016

<sup>5</sup> SCD25 Haven Gateway Water Cycle Study Stage 2 November 2009

<sup>6</sup> Sue Bull Anglian Water Northern fringe Community Steering Panel 12<sup>th</sup> February 2013

synergistic effects of housing and jobs growth, both within and just outside the Borough, on traffic, air quality and climate change assume an optimistic view of 15% modal shift from cars to more sustainable transport options **with no evidence** to back this up. The 2011 census shows that cycling, walking and bus usage all fell from 2001 levels. The closure of all three dedicated park and ride routes needs to be considered in the SA.

We note the inclusion of the strategic employment site of the disused Sugar Beet factory, which although now owned by IBC, fails to get a mention in the updated IBC Core Strategy. As the largest financial investment by far that the Council has made in Ipswich, clearly the Council will need to give this site major attention and resource in achieving a return on its investment. The impact of this needs to be assessed in the SA. IBC states that it will focus development on the town centre and in creating jobs within the Borough (as opposed to in Babergh DC where the Sugar Beet site is located). Clearly this has changed.

Unfortunately the SA still fails to recognise that the delivery of the entire Ipswich Garden Suburb might not be viable and has made no assessment of the sustainability /or not of a multi-site development approach has no way of being halted midway due to negative impacts on the town, including severe traffic congestion and poor air quality. The SA needs to take account of the Transport modelling and the NOx emissions arising from increased congestion and the associated health effects on Borough residents.

There is still no sewage solution for the IGS and as the June 2016 flooding in Westerfield shows, the current drainage system is unable to cope and further flood defence works will be required to accommodate the IGS. The SA needs to address these in order to be sound.

**In our opinion to improve soundness the SA should consider the reasonable alternative of IBC working with neighbouring Local Authorities to meet unmet need due to non- delivery or only partial delivery of the IGS. They have to work together to meet unmet need so why not include this.**

### **Matter 9 – Transport and Accessibility (including in the IP-ONE Area)**

**Q9.1** *Are the policies and proposals (listed above) in connection with transport and accessibility soundly based? If you contend that they are not how should they be modified?*

1. **Unsound** – Ipswich Borough Council posted 2 new documents on 27<sup>th</sup> May concerning Air Quality and a Traffic Assessment. The Traffic Assessment is unsound, misleading and should be disregarded until the fundamental issues raised below are addressed. The accompanying Air Quality Study critically depends upon the Traffic Assessment results and therefore its soundness is undermined. The Local Plan does not give Air Quality the emphasis it deserves, the objective (11) is a motherhood statement and there are **no** improvement targets, timescales or indicators given. Our previous representations on this matter remain valid.

Understanding these two important aspects is vital for determining the sustainability and soundness of the draft Local Plan. Traffic is a **key topic for Ipswich residents and businesses** whose perception is one of high levels of traffic congestion today and concerns for the future that the high levels of growth planned in the Local Plan, particularly housing, will make matters much worse. This topic has to be seen to be dealt with seriously in a transparent and unbiased way otherwise it will undermine the whole basis of democratic local government as well as confidence in the Local Plan inspection process.

Whilst we very much welcome a traffic assessment study into the cumulative impact of proposed developments, the report lacks detail and is misleading in the way it underplays the effect of the proposals on Ipswich Borough and specific roads. Furthermore, it fails to clearly present information to participants of the Local Plan Examination process, who are not traffic

experts. We are disappointed that Suffolk County Council's response to the report<sup>7</sup> has failed to highlight the various deficiencies that we have highlighted below.

**In summary, the traffic report it is lacking in key information on the underlying assumptions, input data, traffic network assignment and output results and as such there is potential to mislead decision makers including the Government Appointed Inspector, IBC and SCC leaders and officers, as well as the general public. It masks the effects of increased traffic in Ipswich Borough and especially around the town centre by smearing it across a wider area that includes major dual carriageways and far less congested roads. The deficiencies in the report and any consequential deficiencies in the study will need to be addressed before meaningful and informed comments can be made on this matter and revised answers given to the questions raised by the Inspector.**

Below, for both the Traffic Assessment and Air Quality reports, we will explain our concerns, pose key questions and seek information so that a clearer understanding can be made of the impact of the Local Plan developments on Ipswich Borough traffic, the risks and uncertainties involved and whether the negative impact is a price worth paying for growth. We reserve the right for further comment once these matters are addressed. The crux of the debate on soundness will ultimately rest on whether the traffic impact is deemed to be severe or not, although we recognise that unfortunately there is no government definition of this and a local view will need to be formed.

We suggest that the Inspector:

- Arranges a presentation by WSP/Suffolk County Council on the traffic assessment study and report to interested parties, including community groups, explaining how the model works, how trip rates are derived etc and addressing our points below together with those raised through other representations.
- Requires a revised Transport Assessment report/supplementary document be submitted by WSP/Parsons Brinkerhoff as part of the Local Plan examination process. This should include detailing key assumptions and presenting results in relation to the Borough, rather than smearing them across a wider area. The results should show the expected impact on travel times for the worst affected roads as well as those impacted by the IGS development. A corresponding additional statement should be issued on the Air Quality report.
- Allows a period following the above for further representations on the draft Local Plan

#### **A. Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report<sup>8</sup>**

2. Reconciliation of the different conclusions of WSP concerning the above report and those made by WSP concerning the CBRE/Mersea Homes Traffic Assessment<sup>9</sup>.

When referring to the forecast traffic impact in 2031, Section 2.1.23 of the Executive Summary of the above report states 'This impact cannot be considered as severe given the day to day fluctuation in travel times...'. However, when commenting on the impact of the traffic assessment submitted as part of the CBRE/Mersea homes planning application<sup>10</sup>, WSP stated '*Even with the lack of information and methodical flaws, the results indicate that the development (Ipswich Garden Suburb) has a severe impact on network performance and travel times, especially in the evening peak period and with some routes experiencing increases in delay of 15 minutes in*

<sup>7</sup> Letter from SCC to IBC 24<sup>th</sup> May 2016, IBC Core Document Library PSCD18a

<sup>8</sup> Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report, May 2016 WSP/Parsons Brinkerhoff IBC Core Document Library PSCD18

<sup>9</sup> Paragraph 48, SCC Cabinet Meeting 11<sup>th</sup> November 2014

<sup>10</sup> Planning Application IP/14/00638

2021 and more than 30 minutes with the full northern fringe development in 2027.’ The latest report includes the Ipswich Dock crossing but this is not expected to alleviate the affects of the IGS. Furthermore, the CBRE/Mersea Homes assessment includes highway mitigation changes. So, what has changed to significantly improve the forecast impact?

**Would WSP explain what has changed since their view in 2014 that there would be a severe impact on the Ipswich highway network arising from the development of the Ipswich Garden Suburb (based on the CBRE/Mersea Homes Traffic Assessment report) compared with their current view that the impact on the highway network would not be severe (not just from the development of the IGS but also the other cumulative developments)?**

3. Lack of forecast traffic data for Ipswich Borough.

The report study area (Figure 4-1 refers) is far wider than the Ipswich Borough and includes Kesgrave, Martlesham, A14, A12 and country roads in neighbouring Local Authorities broadly similar to the Ipswich policy Area. Whilst we understand the need to model areas outside of Ipswich Borough that will impact on traffic within the Borough, it is important that forecasts make clear what results refer to Ipswich Borough and what results relate to the extended network. The Ipswich Local Plan only relates to the former. As an example Section 2.1.23 does not make clear whether the average travel time per trip is for the study area or for Ipswich Borough. Similarly for average vehicle speeds. Ipswich predominantly has 30 mph speed limits with some advisory 20mph zones. The inclusion of the A14 with a 70mph limit and country roads with 60mph limits will distort average speed data.

**What are the traffic forecasts for Ipswich Borough? and what are the travel times and delays for the worst affect roads**

4. Traffic Modelling Risks are not quantified – Decision makers need to understand the risks

It is widely recognised that traffic modelling carries risks and these need to be mitigated.<sup>11</sup> Forecasts by their nature are uncertain particularly as longer timescales are assumed. Model results may mislead decision makers if there are errors in the inputs (e.g. trips) and also traffic network assignments. According to section 4.7.3 (last reference) ‘Inputs to transport models should be transparent and straightforward to audit’. From the WSG report this is not the case e.g. it is not possible for us to check Tables 5-1 & 5-2. Section 5.3.4 (last reference) refers to the need to construct an ‘Uncertainty Log’ that identifies sources of uncertainty. Also Section 5.3.7 states ‘Decision-makers need to understand these risks, so it is important for analysts to communicate them well and quantify them if proportionate’. The Transport Assessment fails in this respect.

**The Transport Assessment needs to ensure that data used in the model is transparent and straight forward to audit also that an Uncertainty Log is included that identifies the sources of uncertainty and associated risks.**

5. Trip Rate data is critical and needs further explanation

The demand placed on a traffic network is critical for determining how the network will perform. The mode of travel, the number of trips generated, the attraction of the destinations and route assignment are all critically important in assessing network performance.

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<sup>11</sup> Section 4.7 Department for Transport TAG Unit M1 Principles of Modelling and Forecasting January 2014

However the assumptions underpinning trip rate 'production' and 'attraction' are unclear and difficult to reconcile with employment data. It is unclear how the National Trip End Model (NTEM) Trip rates shown in Table 5-1 were obtained and whether they refer to nationally derived statistics or local data. From the table the total Commuting and Business Trips/Household/Day for all modes is 0.796. We assume this refers to trips originating from a residence and does not include returning home trips. From the EEFM 2014 data<sup>12</sup> the forecast average number of jobs per residence for 2031 for Ipswich and Neighbouring Local Authorities is approximately 1.1 for each of the authorities. One would expect to see a reasonable correlation between the 2 figures however the difference is large, nearly 40% and this requires explanation and justification, as the model outcome is critically dependent on trips input.

Similarly we are unclear what the production commuting figures for Employment (Trips/Job/Day) refer to. It would seem reasonable to assume they refer to homeward commuting trips and one would expect a reasonable balance between car trips from home to the office and a office to home, accepting that some homeward bound trips may call via other destinations first such as a shop or the gym.

From Table 5-1

Trip generation/household/day for car commuting = 0.575

Pro rata per job/household/day trip generation =  $0.575/1.1 = 0.523$

Compare this with commuting trips/job/day by car from an employment site = 0.107

There is roughly a factor of 5 lower from the employment site than one would expect so why is this?

The underlying assumptions for trip rates also need to be made clear, e.g. are they averaged over a weekday or a week or a year?; does the averaging include school holidays?; what are the assumptions on modal shift, does it focus on the winter months when active modes decrease etc?

**Would WSP explain the underlying assumptions that underpin the trip generation data and in particular Tables 5-1 and 5-2?**

6. A Sensitivity Analysis and error margin need to be included

Forecasting is an uncertain business and the accuracy decreases with increasing timescales. Forecasting traffic for the year 2031 carries much uncertainty. Furthermore, traffic models are non-linear and once a critical point is reached a small change to the input (traffic demand) can have a major impact on congestion. One way of handling this uncertainty and improving the robustness of the forecasts is to perform a sensitivity analysis by varying the model inputs to gauge the change in outcomes and the other is to include a margin of error both in the model input and growth assumptions. We note from WSP comments on CBRE/Mersea Homes Traffic Assessment<sup>13</sup> *'Some initial sensitivity tests have shown that some of the changes, such as minimum gap (the assumed space between slow moving vehicles which is understated by a factor of 4 in the model) have a large impact upon modelled network performance.'* For assessing development projects additional margins are sometimes factored in on trip rates, for example the TRICS database on trip rates includes an 85 percentile for trip rate sensitivity. From the Traffic Assessment report it would appear neither a sensitivity analysis nor safety margins have been included.

**To improve the robustness of the traffic model forecasts we recommend a sensitivity analysis and additional uncertainty margin be factored in.**

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<sup>12</sup> East of England Forecasting Model (2014) ICD13a

<sup>13</sup> Paragraph 47 Suffolk County Council Cabinet Meeting 11<sup>th</sup> November 2014 Concerning Ipswich Northern Fringe

7. The underlying assumptions on travel mode have not been made clear and justified.

Section 2.1.11 of the report points out that both the demand model and highway assignment model networks have been updated to allow for modal choice and the results from the latest model show less stress than the August 2015 draft *‘the demand is less due to different development assumptions and trip suppression’*. Section 2.1.13 states *‘The demand model is able to take account of the congestion that might be generated by additional development and reassign trips to other modes, such as walking, cycling and public transport’*.

**The underlying assumptions on travel mode could have a major affect on the traffic forecasts and need to be made crystal clear, including how the computer models reassign trips from car travel to walking, cycling and public transport?**

According to Suffolk County Council the Travel Ipswich Scheme has been completed. The scheme aims to reduce dependency on the private car by 15% within the lifetime of the plan, however, no information on its effectiveness has been published. The leader of IBC stated<sup>14</sup> in the Local newspaper on 14<sup>th</sup> June 2016 *“This system has never worked properly and the experience of most people is that it has just made congestion worse.”*

**Has ‘Travel Ipswich’ been incorporated into the Traffic Model and if so what modal shift assumptions have been assumed and what is the measured performance?**

Between 2001 and 2011 modal shift away from car usage to more sustainable modes has not happened, in fact the reverse is true as can be seen from Table 1.<sup>15</sup>

Table 1: Journey to Work Mode Share of Ipswich Residents

Mode	2001 Mode Share	2011 Mode Share	Change
Train	0.9%	2.5%	+ 1.6%
Bus, Mini Bus or Coach	9.0%	8.2%	- 0.8%
Motorcycle, Scooter or Moped	1.6%	1.2%	- 0.4%
Driving a Car or Van	46.9%	57.7%	+ 10.8%
Passenger in a Car or Van	6.6%	7.3%	+ 0.7%
Taxi or Minicab	0.5%	0.4%	- 0.1%
Bicycle	9.4%	4.9%	- 4.5%
On foot	24.3%	17.2%	- 7.1%
Other	0.7%	0.5%	- 0.2%

**Since 2011 the Bury Road Park & Ride has closed and the two remaining Park and Ride Services in Ipswich are being converted to normal bus services with a reduction of bus lanes on the route. Has this been modelled?**

We also note the Draft Core Strategy Paragraph 6.7 d) states, “Additional short stay parking and enhanced park and ride will provide for car-borne shoppers, visitors and the workforce. **The park and ride is being downgraded, not enhanced!**”

<sup>14</sup>[http://www.ipswichstar.co.uk/news/are\\_there\\_too\\_many\\_traffic\\_lights\\_in\\_suffolk\\_1\\_457616](http://www.ipswichstar.co.uk/news/are_there_too_many_traffic_lights_in_suffolk_1_457616)

<sup>15</sup> IBC Document ICD48b Background to the Transport Evidence informing the Ipswich Local Plan December 2015



The assumption in this report that congested roads will increase cycling is flawed. Due to the increased traffic, cycling in Ipswich is already far slower and more dangerous than it used to be. With the increased traffic it is difficult to see where additional cycling lanes could be provided to make cycling more attractive.

**We are very sceptical about forecast claims for modal shift when the evidence points otherwise. Unrealistic assumptions on modal shift could seriously underestimate the traffic impacts on Ipswich and mislead decision makers. Modal shift has been quoted in the report as a reason why the latest modelling shows less stress than the August 2015 modelling (which hasn't been made available to the public but should be). This appears very suspect! Assumptions on modal shift need to be clearly stated including any inbuilt algorithms in the models.**

8. Overall Mean Delay is an insufficient and misleading statistic

The report produces an estimate of the increase in mean traffic delay from a base year of 2008 to 2031 over a highway network area approximating to the Ipswich Policy Area. The report takes into account specified development sites (contained within Appendices A & B) as well as background growth traffic growth to meet the housing and employment growth targets. We note from section 4.6.1 *"the plan provides for more B Class uses than the net requirement identified."* In fact the identified requirement is 23.5ha compared with an allocation of 59ha. **This would require assumptions to be made on how B class jobs are allocated to the available sites e.g. was a simple scaling factor used or were some sites chosen in preference to others. The report should clarify what assumptions were made since this could seriously affect the model results.**

Whereas the mean delay across the entire modelled network gives an indication of impairment it could be argued that it is insufficient and potentially misleading since it tells you nothing about the probability distribution and its characteristics (e.g. its variance), nor does it give a breakdown of key affected areas such as Ipswich Town Centre, nor does it give delays on key affected road links (unlike the SCC 2008 Assessment<sup>16</sup> and the Ipswich Garden Suburb Transport Assessment<sup>17</sup>).

**We feel link travel times (link data + junction delay) showing link length, journey time and increase in journey time is essential for members of the public and non-traffic experts to understand the impact of road congestion on their daily lives and for the Inspector to judge whether or not the impact is severe.**

The mean delay is assessed for the evening and morning peak hours but is not clear whether these:

- Refer to weekdays or are averaged over a 7 day week.
- Are averaged over a year or are for non-school holiday days

Traffic during school and public holidays is totally different to weekday traffic and winter traffic tends to be worse as more people switch from active modes.

**The report needs to produce statistics that are relevant for Ipswich Borough and clearly state the underlying assumptions to which they refer. We suggest it is more meaningful to model the winter traffic scenario for non-school holiday days focussing on morning and evening rush hours for weekday traffic.**

**The mean delay needs clarification and is insufficient even with junction data to give an informed position. We request as a minimum the report include link**

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<sup>16</sup> ICD48 Ipswich Transport Model Assessment 2010

<sup>17</sup> CBRE Global Investors and Mersea Homes Transport Assessment submitted as part of a Hybrid Planning application for the Ipswich Garden Suburb IP14/00638 29<sup>th</sup> July 2014

**travel times (link delay + junction delay), as well as sensitivity modelling and a margin to be included for uncertainties. The latter is standard practice in any form of business planning.**

#### 9. Uncertainties in Junction Congestion

The report also identifies junctions that are close to or at full capacity during the rush hours by investigating forecast volume/capacity (V/C). **A definition of a junction in the Glossary would be helpful.** Figures 2-1 and 2-2 seriously underplays the number of junctions with congestion issues since they only refer to a V/C of 100% or over in both the morning and the evening rush hours. Members of the public would look at these figures and wonder what has happened to all the other junctions they know experience significant congestion today, yet alone in 2031. The reason is that junctions have not been shown where only one of the rush hours exceeds 100+. Tucked away in Appendix F are tables that show junctions where at least one V/C exceeds 100+ and tables with at least one V/C in the range 90-99. For example, for the single lane gyratory system there are 41 junctions with at least one V/C of 100%+ and 33 in the range 90-99. These should have been included on a single map to better illustrate the problematic junctions. We were surprised not to see the Argyll Street (A1156) junction with St Helens Street listed as this link had been identified as a problem in the CBRE/Mersea Homes assessment.

**To give a better understanding of the scale of problematic junctions, junctions with at least one V/C of 100+ and at least one in the range 90-99 should also be included in Figures 2-1 and 2-2 and delays included in the tables. A list should also be given of Ipswich junctions filtered out from the study (e.g. those below 500 traffic movements) so they can be audited.**

#### 10. Assumption of a Wet Dock Crossing

The traffic assessment assumes the Ipswich Wet Dock Crossing will be built. Whilst the Chancellor of the Exchequer confirmed the government's support for this project in the March 2016 budget, 20% of the estimated £90-100M funding needs to be found from local sources. Following the budget statement the New Anglia LEP stated<sup>18</sup> *'There now needs to be a review of the decision to determine funding for this project'*. This would imply that matters are not as yet 'set in concrete' and there is still a risk that the project would not go ahead.

**This risk that the Ipswich Wet Dock Crossing might not go ahead should have been made clear in the Traffic Assessment and a forecast should be produced without the Crossing. The report needs to clarify which routes within Ipswich the Dock Crossing will help alleviate congestion.**

#### 11. Ipswich Garden Suburb

**Since this is a key plank of the Ipswich Draft Local Plan a separate section of the report should assess the impact of this development.**

#### 12. Other Traffic Aspects

- **What is the minimum gap assumed between queuing cars (key concern of WSP for the CBRE/Mersea Homes traffic assessment)**
- **How are cyclists taken into account in relation to modelling vehicle trip times since they will occupy road space, without dedicated cycle lanes, and will occupy box space at some traffic lights thereby slowing down traffic accelerating from junctions?**

<sup>18</sup> <http://www.newanglia.co.uk/2016/03/16/government-green-light-for-ipswich-wet-dock-crossing/>

- **How has the effect of more people walking and using signalised junctions been taken into account?**
- **To what extent has road car parking that prevents 2-way flow been incorporated into the model? This is a real problem in many parts of Ipswich.**

## **B. Air Quality Comments**

The Air Quality Report<sup>19</sup> models air quality for the Ipswich Urban area with the objective of enabling IBC to identify locations where they may be risk of exceedance in 2031.

The reports risk assessment has been based on the forecast junction capacity at 2031 as modelled in the Traffic Assessment<sup>20</sup>. We challenge the soundness of the Traffic Assessment above and until these issues are resolved the soundness of the Air Quality report must also be questionable.

13. Section 1.1.3 states '*in the time available it has not been possible to undertake air quality modelling of the 2031 future forecast scenario for road traffic reflecting conditions with all Local Plan proposals in place*'. **For soundness this should be done**, as poor air quality is already known to increase premature deaths in Ipswich.
14. We note from Fig 3-5C that relates to the vicinity of the IGS development, that there will be junction capacity issues at Henley Road, Westerfield Road and Tuddenham Road with expected high levels of Nox.
15. We note that there will be increased congestion at several junctions within AQMAs. St Matthews, St Helens and St Margarets primary schools all lie within air quality problem areas and a nursery school in Chevallier Street. Medical evidence shows there is a detrimental impact of poor air quality on young and developing bodies. It is unsound to approve a plan that further increases emissions above legal limits especially around schools.
16. IBC have been planning to move to a single AQM Zone but there is no mention of this in the report. The report also needs to consider compliance with European legislation and provide a summary of IBC's air quality monitoring reports so the Inspector can properly consider the potential impacts.
17. Some measuring sites have been excluded. These need to be clearly stated since they may distort the results.
18. The IBC AQMA paper was due to go to the Executive in October 2015 prior to the Local Plan examination. It was rescheduled for June 2016 but has now been put back to September 2016, i.e. after the examination, despite the Inspector requesting further detail on Air Quality. This is unacceptable and needs to be considered as part of the examination.
19. **In view of the health implications and publicity on the subject we would expect air quality to feature strongly in the draft Local Plan but this is not the case and so it is unsound.** Although IBC has an objective to improve air quality it is bundled into an objective with other matters and is poorly defined namely '*OBJECTIVE 11: To improve air quality and create a safer, greener more cohesive town.*' The AQ objective is really a 'mother

<sup>19</sup> Air Quality Report 27<sup>th</sup> May 2016 WSP/Parsons Brinkerhoff IBC Core Document Library PSCD19

<sup>20</sup> Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report, May 2016 WSP/Parsons Brinkerhoff IBC Core Document Library PSCD18

hood statement' with no indicators, targets or timescales in the Local Plan<sup>21</sup> and so will achieve precisely nothing. To become effective and improve soundness it needs to be made SMART (Specific Measurable Achievable Realistic and Timely).

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Issue 1 22nd June 2016

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<sup>21</sup> Section 11, Objective 11 Proposed Submission Core Strategy Review IBC Core Document PSCD14