



SAVE OUR COUNTRY SPACES (SOCS)- June 2016

Matter 9 Transport and Air Quality (with Transport comments as Appendix A).

SOCS Sign up to NFPG comments on the Transport Report entirely

Traffic and Transport, Air Quality – Unsound

In the light of the UK “Brexit” Decision on the 23rd June, although the legal situation and requirements will stand until Article 50 is invoked, SOCS ask PINS what are the implications for IBC Local Plan and Revision of the Core Strategy in the future and up till 2031?

SOCS have received feedback and guidance from two experts to date on the air quality concerns raised within this submission for IBC Core Strategy Inquiry in Public. SOCS, representing the lay public, felt obtaining expert guidance was necessary in order to give credibility and to qualify their concerns and criticisms.

Expert opinions SOCS have secured;

Dr Benjamin Barratt Lecturer¹ in Air Quality Science and Roger Richards² former Principal Engineer with Ricardo Consulting Engineers.

Dr. Barratt confirmed the legal requirements that no existing LAQMA should be further adversely impacted by further developments.

Mr Richards states, “I’ve read through the (WSP)AQ report. It’s very poor. Here’s a summary of the main flaws in the document (5 points -See Appendix F).....Any one of these failings would render the report unreliable. Taken together they render it completely meaningless.”

The WSP Reports suggest there is only a “moderate” predicted problem regarding traffic impacts and air quality. **We can’t see this to be the case.** We do not trust the “reassurances” contained in the reports. The experts above agree there are causes for concern.

SOCS believe Air Pollution impacts to be critical to our local area and local population.

We believe they are an uncomfortable truth which is currently at risk of being “buried”.

SOCS Summary Opinion

SOCS argue that Matter 9, Transport and Air Quality is the *single most important factor* affecting the CS Review.

The Precautionary Principle should apply and IBC should be allowed to tailor its expansion and growth to public safety and environmental constraints, to truly, sustainable, manageable, achievable, safe levels of modest /low annual housing growth, in line with new employment growth. The NPPF says as much explicitly.

We have gone through the following newly issued guidance;

LAQM Technical Guidance LAQM.TG16 is available [here](#).

<http://laqm.defra.gov.uk/supporting-guidance.html>

1 Department [Analytical & Environmental Sciences](#) Research Group [Environmental Research Group](#) [MRC-PHE Centre for Environment & Health](#)

2 Roger Richards Opinion on the IBC May 2016 WSP report- Appendix F. He has worked on various engine areas, from [Stirling engines](#) through [alternative fuels](#) and artificial intelligence applied to condition monitoring. He is responsible for the development of novel techniques for improving efficiencies and emissions of large engines.

The WSP Traffic Appraisal and traffic modelling determine the Air Quality and Pollution risk levels. SOCS agree with NFPG who state,

*“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. (Note that the recent Traffic Assessment discussed under Matter 9 includes the IGS development **but does not specifically assess the impact of the development**. We have severe misgivings about this latest report and the underlying assumptions particularly on modal shift, as discussed below).*

In their response to the CBRE/Mersea Homes IGS planning application, 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”

This 2016 (WSP) report’s risk assessment NFPG say, **“has been based on the forecast junction capacity at 2031 as modelled in the Traffic Assessment³”**.

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.”

The WSP report does not assess the Air Pollution Impacts from rail and diesel freight which are a significant nuisance and air pollution trigger in Ipswich, particularly associated with the Felixstowe line and dock traffic. This source of pollution will cause further adverse impacts on the IGS and add to the cumulative air pollution burden of northern and central Ipswich.

Air Pollution (AP) is widely described as the “Invisible Health Risk”.

Air Quality (AQ) is a serious health risk and significant problem currently in Ipswich, SOCS feel it is “disingenuous” to suggest it will be less so in the future or only a “moderate” “predicted” problem. (As opinioned in the WSP report).

- **SOCS recommend that the Inspector be furnished with a mobile air quality monitoring device, like that used by the Environmental Audit Committee, to determine for himself what risks are impacting on pedestrians, residents and children in the urban roadside schools within the LAQMA.**

At a time when there is growing awareness of air pollution impacts, the Government, with the introduction of the NPPF in 2012, have *reduced* the bar of “*nil detriment*” to a lesser bar of “*no serious adverse effects*”. Only recently has case law quantified what that may mean in practice on congestion, waiting times and pollution.

AP and AQ also pose a health risk, which appears to be swept under the carpet or below the radar of action locally by the responsible bodies like, SCC Public Health and SCC Transport. Responsibility for Air Quality is a split responsibility with SCC in charge of highways and transport.

In 2014, SOCS had made a request for consideration of a Public Health Impact Assessment⁴ of the IGS expansion (bearing in mind the nearby adjacent current pollution problems) via Environmental Health SCC specialist Penny Moys, but that has not been actioned as yet.

With SCC now appearing to have no in house support to the public currently and with SCC Public Health having just lost it's Director of Public health, the chances of a response appear remote.

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

4 Under the Public Health Outcomes framework outlined by Daniel Instone formerly of DEFRA

SOCS question to the Inspector is, who are the public (or the Inspectorate) to approach for guidance and expert opinion and support? We have had barely 3 weeks to evaluate the WSP Report conclusions and to try to offer a coherent response to a very difficult and complex issue. Environmental Health officers are most helpful but time and resource limited. SCC no longer support adequate in house officer resource.

The inherent problem for Ipswich is its mediaeval road layout, constraints and urban density. IBC Environmental health state that here is no way to alter the road system to mitigate for the problems of congestion and air pollution.

The policy of car access reduction in central Ipswich has been abandoned with the town car parking recent developments.

Car park sites are one of the biggest growth industries in Ipswich for which IBC is also guilty. The huge expansion of retail driven car parking capacity in central Ipswich has not been referenced in the WSP report. The 12,000 likely residents of the IGS will "feed" the LAQMA problem by driving down the funnel of routes to the town centre.

As a result of this fact and failure of other sustainable public transport measures, SCC mitigation measures to date have effectively failed to stabilise levels of air pollution yet alone effect improvements.

Ipswich has had serious air quality problems "formally" identified since around 1999.

As a DEFRA "LAQMA", it has in house expertise within it's Environmental Health Department who monitor, collate and report back to DEFRA. Ipswich developed an Action Plan in 2008 which is due for review (possible after the September Air Quality Report goes to Council.)

The Eastern region is also exquisitely vulnerable to the pollution from London and the continent, with NO₂, particulates, PM 10 and PM 2.5 and ozone identified and monitored by Air Quality England Interactive mapping⁵. (Map examples -pg 5)

However, IBC have no legal requirement currently to *measure* particulate levels.

Historical background and current state of play.

Ipswich was singled out and has had an identified problem since 2000/2001 when they were visited by Professor Frank Kelly of King's College London,⁶ for the emerging EU Air Quality work and legislation. IBC Environmental Health officer monitor, assesses and provides reports to DEFRA and drafts the Action Plan for improvement. The department advises but cannot determine policies.

Ipswich BC has a statutory duty to declare Air Quality Management Areas.

"The most important pollutant of concern in Ipswich and its air quality, is nitrogen dioxide (NO₂), and today's levels in certain areas do not meet national health-based annual average objectives of 40 ug/m³. In Ipswich the most significant source of NO₂ is from emissions of oxides of nitrogen (NO_x) from road traffic in congested areas." Quote taken from IBC's Ipswich Air Quality Action Plan 2008.

"All areas require some reduction of emissions from sources to meet NO₂ concentrations of 40 microg/m³." Quote from monitoring of 3 AQMA's in IBC's 2008 Action Plan.

⁵ Web links - https://uk-air.defra.gov.uk/assets/documents/annualreport/air_pollution_uk_2014_issue_1.pdf

⁶ Professor Frank Kelly of Analytical & Environmental Sciences Division; Professor of Environmental Health Director, Environmental Research Group Deputy Director of the MRC-PHE Centre for Environment and Health

Despite best efforts, improvements to traffic, congestion and air quality impacts have not materialised - nor has the pledge, (linked with Ipswich as an identified "Growth Point") to stabilise traffic to 1999 levels been achieved.

In 2000, 7 of the identified pollutants were deemed not to be a problem and therefore "screened out" at that stage with, SOCS have been told, "no legal requirement at that time to assess for PMs" -(save them triggering a reassessment of the situation in the future? (pm 2.5 and pm10s)).

In 2000, 3 LAQMA were identified, now we have 4 (?) all of which appear to be growing in physical size and area.

The Air Quality England interactive mapping is inaccurate currently for Ipswich. However, it suggests continuous monitoring ceased in 2011, 2012 and 2015? - (due to the adverse costs to replace faulty equipment) so no continuous monitoring, only Diffusion Tubes data are available. Between 2000-2008, Ipswich, an industrial and manufacturing town lost 50% of these jobs and these industries. Even with a reduction of industrial related pollution and the decommissioning and removal of the power station has not effected improvements. **Predicted** improvements have not materialised, in fact the converse is true, as these brownfield industrial sites are now all housing sites /flats with commensurate increase in town centre vehicles.

In 2009 SCC projected dubious predictions from a challenged traffic modelling approach, in our view. Their modelling invoked criticism within the Haven Gateway A14 Corridor Transport Report.⁷

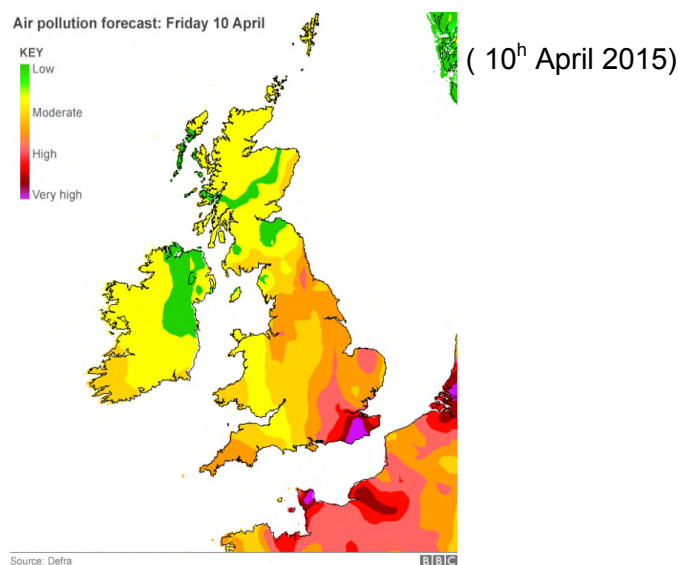
However, since 2009, the science and legislation has moved on with SOCS concerns focused on **particulates impacts** from our increasingly congested and constrained town.

The SCC Highways authority has embarked on a "Sustainable" Transport -Traffic Plan (Fit for the 21 Century) which is way behind schedule and as yet, appears to be making matters worse not better. See;http://www.eadt.co.uk/news/hundreds_dying_because_of_air_pollution_in_suffolk_and_essex_1_4539239

http://www.ipswichstar.co.uk/news/what_is_causing_the_air_pollution_health_emergency_in_suffolk_and_north_essex_1_4541221

We, in Eastern Region, are exquisitely vulnerable from particulate impacts as advised by DEFRA due to LAQMAs and impacts from London and the continent.

<https://uk-air.defra.gov.uk/library/annualreport/> see maps particulates and ozone.



⁷ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/SDC_19_Haven_Gateway_Ipswich_A14_Study.pdf

Figure 5-7 Urban major roads, annual mean roadside PM₁₀ concentration, 2014 ($\mu\text{g m}^{-3}$)^d

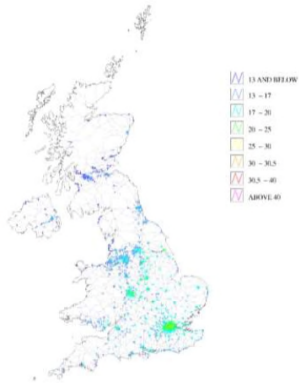
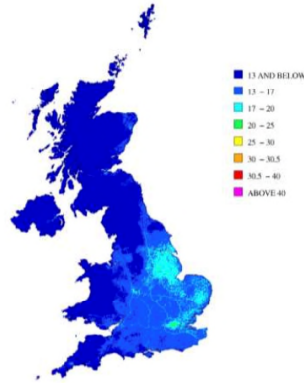


Figure 5-8 Annual mean background PM₁₀ concentration, 2014 ($\mu\text{g m}^{-3}$)



PM 10

^d In both the maps on this page, the legends show the upper limit of the concentration band – for example, "25-30" means greater than 25 $\mu\text{g m}^{-3}$, less than or equal to 30 $\mu\text{g m}^{-3}$.

46

Figure 5-10 Urban major roads, annual mean roadside PM_{2.5} concentration, 2014 ($\mu\text{g m}^{-3}$)^e

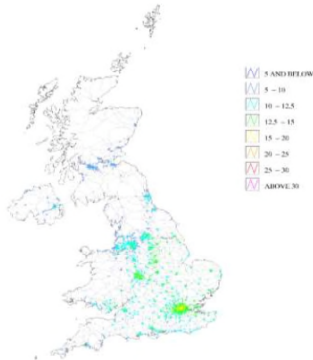
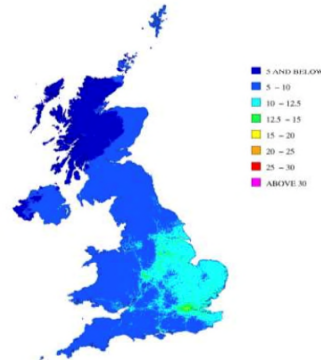


Figure 5-11 Annual mean background PM_{2.5} concentration, 2014 ($\mu\text{g m}^{-3}$)



PM 2.5

^e In both the maps on this page, the legends show the upper limit of the concentration band – for example, "5-10" means greater than 5 $\mu\text{g m}^{-3}$, less than or equal to 10 $\mu\text{g m}^{-3}$.

Figure 5-20 Average AOT40, 2010-2014 ($\mu\text{g m}^{-3}\cdot\text{hours}$)^f

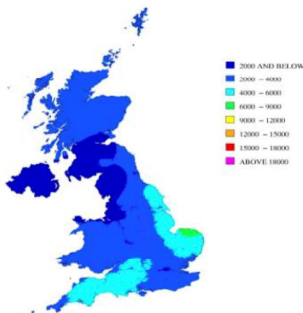
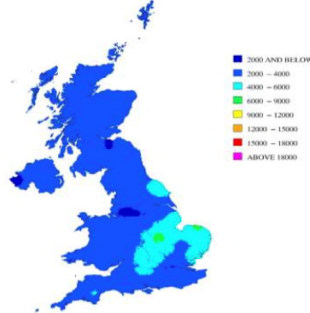


Figure 5-21 Average AOT40, 2014 ($\mu\text{g m}^{-3}\cdot\text{hours}$)



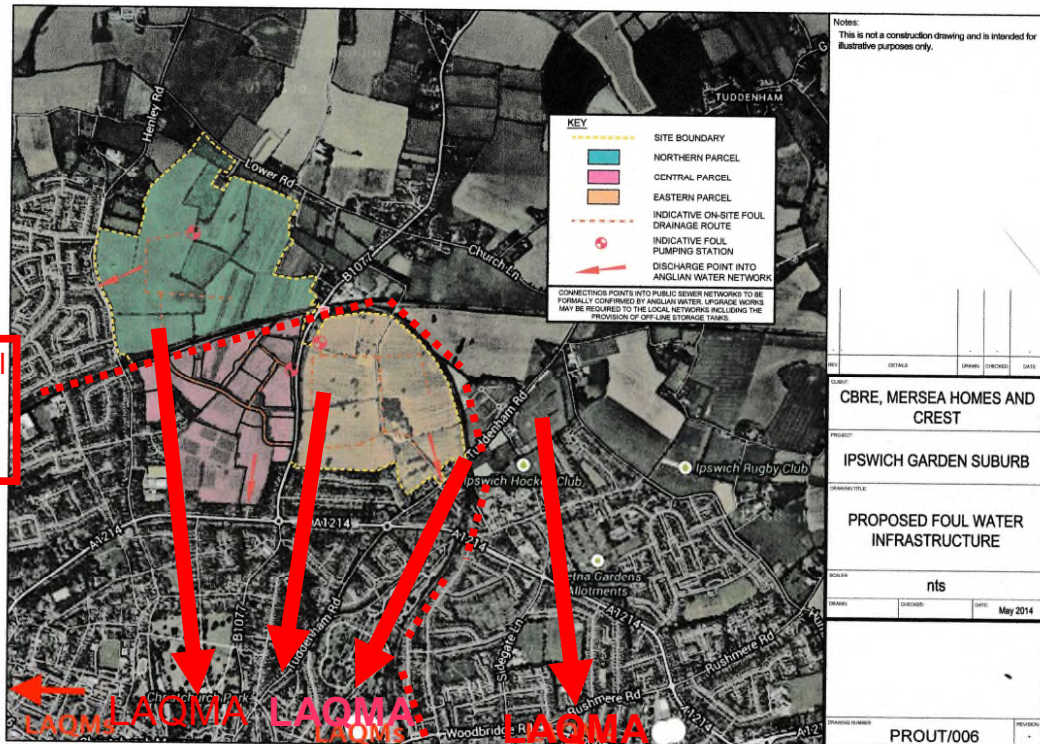
ozone

^f In both maps on this page, the legends show the upper limit of the concentration band – for example, "6000-9000" means greater than 6000 $\mu\text{g m}^{-3}\cdot\text{hrs}$, less than or equal to 9000 $\mu\text{g m}^{-3}\cdot\text{hrs}$.

Future expansion of Ipswich

No Public Health Impact Assessment study from traffic and air quality has been done of the proposed expansion despite being requested by us.

Bearing in mind the above, we have concerns that the planned expansions to the east and North of Ipswich 4000 -7000 ? (SCDC Eastern Fringe) homes- with even a conservatory estimate of extra trips on the north town radial route -which was deemed "at capacity in 2001!) - 6000 homes plus cumulatively with other LAs, traffic which will all funnel down to the town and the 4 LAQMAs causing significant and "serious" adverse effects. (see attached map)



WSP say, (my emphasis),

"the purpose of the report is not to predict precisely where air quality exceedances will occur in 2031. However, it does enable the Council to identify locations where there may be a risk of an exceedance in 2031. This will help to inform the need for future monitoring and mitigation.

WSP "1.2.9 The Local Plan seeks to ensure that new development takes place in a way which promotes sustainable travel and does not adversely affect air quality. Policy DM17 'Transport and Access in New Developments' requires new development to not result in a significant impact on air quality or an AQMA "

The conclusions reached in the WSP Air Quality Report May 2016- that only a "moderate" "predicted" problem- is at odds with other opinion and inconsistent with previous specialist Sharps Redmore Transport Modelling and Air Quality Reporting in 2014 which highlight the elements of uncertainty on modelled risks and predictions.

WSP highlight this uncertainty factor in their report. In 2014, SOC responded to the CBRE Mersea Homes EIA Sharp Redmore Consultant report⁸

⁸ **Essential reading** -Marked up and comments added- Specialist CBRE Air Quality report in Environmental Impact assessment Statement-Appendix-C

WSP mention that Euro 6 Cars may provide future relief from pollution and some mitigation.

In the light of the week's revelations in the media that **Diesel cars pollute more in cold weather⁹, this mitigation cannot be relied on; Euro 5 cars likewise.**

The public have a high level of concern over the likely health impacts from air pollution currently and with the science "firming up" on the risks¹⁰, fear about the future impacts from increases in volume of traffic, congestion and related pollution is understandable.

Letters have been published within the press to this effect.¹¹

The public perceive this as an on going and growing problem not a diminishing one. The housing led expansion of Ipswich SOCS feel is a dangerous and risky Core Strategy approach.

It is likely to result in an SCC "conservative" estimate of 7000 extra traffic movements daily from the IGS alone onto roads which we assessed by SCC "at capacity" in 2001!

SOCS feel that the problem for IBC is "external forces" and lack of overall control; especially SCC flawed and inadequate transport policy and modelling.

Currently the SCC monitoring devices are decommissioned for continuous monitoring, so there is NO CONTINUOUS MONITORING going on at all in Ipswich SOCS understand.

Additionally, it appears that 25% of the availability date for WSP to work on has been "screened out". NFPG commented,

"Some measuring sites have been excluded. These need to be clearly stated since they may distort the results."

- **So SOCS ask the Inspector to assess how can the modelling done and predictions made be adequate and robust enough to accept at face value?**

We look to the Inspector to understand these risks and constraints and allow a lower growth requirement, as York have recently done (see Matter 5 references).

The impacts of congestion and extra traffic from the IGS are likely to impact St Margaret's Ward most. St Margaret's is the most densely populated ward in the Borough and sits above the LAQMA "hot spots". (See map¹² attached).

SOCS have particular concern about young children in the LAQMA areas roadside Ipswich Primary schools. Bearing in mind the findings in the recent BMJ report¹³

BMJ-2016;6:e010004doi:10.1136/bmjopen-2015-010004 Epidemiology - Association between neighbourhood air pollution concentrations and dispensed medication for psychiatric disorders in a large longitudinal cohort of Swedish children and adolescents

9 <http://dailym.ai/28NJGjm> <http://247wallst.com/autos/2016/06/22/diesel-cars-pollute-more-in-cold-weather/>
<http://arstechnica.co.uk/cars/2016/06/europes-diesel-cars-may-be-spewing-nox-more-flagrantly-than-previously-thought/>

Below 18°C, European diesels emit nitrogen oxide at an alarming rate, report saysCar companies take advantage of loopholes in European rules to become polluters.

10 WHO and recent BMJ Study, June 2016, on impacts on Children's health

11 Letter EADT September 2014-Appendix D

12 Map of IGS in relation to LAQMA-

13 <http://bmjopen.bmj.com/content/6/6/e010004.full?sid=2b687d0e-d14b-425d-a7b0-e9078efc9ae0>

- where even moderate and low levels of exposure are considered a risk,

" The new research found that relatively small increases in air pollution were associated with a significant increase in treated psychiatric problems."

SOCS note NFPG comment,

"St Matthews, St Helens and St Margarets primary schools all lie within air quality problem areas. Similarly there is a nursery school in Chevallier Street, one of the current AQMAs. We have particular concerns of the impact of poor air quality on young and developing bodies."

We urge the Planning Inspector to consider this impact in the light of the WSP conclusion and prediction.

Ben Gummer MP wrote to his constituents in February 2015¹⁴ about his concerns. The letter is attached- Appendix-E

SOCS Recommendations to the Inspectorate

SOCS suggest, in view of the risks associated with expansion of Ipswich and adverse risks posed, the thrust of the CS is inherently unsustainable, by posing significant and serious potential risks to public health and to future generations it does not accord with **Bruntland** nor does it address the **Climate Change Agenda**.

Air Quality has the potentially to fail the **SE, SEA and AA** test, as **pollution knows no boundaries** and the **cumulative and compound effects of London and Continental impacts must be taken into account**. (see Air Quality England interactive mapping <http://www.airqualityengland.co.uk/> *Air Quality England*, a website by Ricardo Energy & Environment.)

SCC transport mitigation measures are increasingly problematic and are perceived as failing, as indicated in the Matter 5 submission.

Advice from Environmental Protection UK;

It is contrary to Core Planning Principles of the NPPF that planning should contribute toreducing pollution".¹⁵

NPPF

4.3

..... In terms of air quality, particular attention should be paid to:

- compliance with national air quality objectives and of EU Limit Values^{16,17};
- whether the development will materially affect any air quality action plan or strategy;
- the overall degradation (or improvement) in local air quality; or
- whether the development will introduce new public exposure into an area of existing poor air quality.

4.7

The PPG states that "Whether or not air quality is relevant to a planning decision will depend on the proposed development and its location. **Concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor.**

6. Undertaking an Air Quality Assessment

¹⁴ **Letter Ben Gummer-Appendix-E**

¹⁵ Environmental Protection UK, in partnership with the Institute of Air Quality Management, have produced a guidance document *Land-Use Planning and Development Control: Planning for Air Quality*, which replaces the 2010 EPUK Guidance document, to ensure that air quality is adequately considered in the land-use planning and development control processes.

6.2

Where a development requires an air quality assessment, this should be undertaken using **an approach that is robust and appropriate to the scale of the likely impacts**. One key principle is that the assessment **should be transparent and thus, where reasonable, all input data used, assumptions made, and the methods applied should be detailed in the report (or appendices)**.

Content of an air quality assessment

6.16

The intent of an air quality assessment is to demonstrate the likely changes in air quality or exposure to air pollution, as a result of a proposed development. Often these changes will be quantified, although in some instances a qualitative assessment will be sufficient. Ultimately, the planning authority has to use this information to form its own view on the “significance” of the effects of air quality impacts, and thereby the priority given to air quality concerns in determining the application. **The assessment therefore needs to provide sufficient information to allow this decision to be made**

SCC & Sustainable transport measures

SCC’s mitigation and “sustainable solutions”, appear not to be working with *increased car* use likely.

- 25% cuts to public transport bus service funding
- reduced passenger trains from Felixstowe forcing more car use
- disabled transport cut recently
- Increased junctions to accommodate the Northern developments are detrimental to cycling adding danger from accident and pollution
- Network Rail have proposed closing a key crossing over the railway which adversely impacts the Fonnereau Way and access to the proposed new Country Park and will also impact children walking from the newly proposed secondary school to the new developments
- One Park and Ride closed and others under threat
- Ipswich cannot generate jobs so people will commute and the north of Ipswich has dreadful road infrastructure and is intersected by two rail lines.
- UTM -replacement of roundabouts are perceived as causing more delays and are not fully operational. Removal of roundabouts has caused increased delay and congestion.

Barbara Robinson SOCS June 24nd 2016

List of Appendices

Appendix A- NFPG Matters 9 Submission (*attached file*)

Appendix B- Organisations I have approached to draft this submission

Appendix C- Marked up and comments added- CBRS/Mersea Specialist CBRE Air Quality report in Environmental Impact assessment Statement (*attached file*)

Appendix D- EADT Letter to Editor

Appendix E - Letter Ben Gummer MP 2015

Appendix F- Appraisal for SOC- Roger Richards¹⁶ former Principal Engineer with Ricardo Consulting Engineers. He has worked on various engine areas, from Stirling engines through alternative fuels and artificial intelligence applied to condition monitoring. He is responsible for the development of novel techniques for improving efficiencies and emissions of large engines. (*attached file*)

Appendix G- Cycle Ipswich (*attached file*)

16 Roger Richards Opinion on the IBC May 2016 WSP report- Appendix F

Appendix A- NFPG Matters 9 Submission (*attached file*)

Appendix B- Organisations I have approached to draft this submission;

1. I have also spoken with Ricardo monitoring staff and other AQ experts concerns about the lack of robust data collection (e.g. continuous monitoring) by Suffolk County Council, as Highways Authority (and IBC over recent years) on the LAQMA sites and the erroneous “incomplete” information on the Air Quality England UK site ; with only 3 sites shown (incorrect) and 3 registered as all currently “closed”.
2. I have approached King’s College, Professor Ben Barrett for advice.
3. I have contacted SCC Public Health for input and the Suffolk Health and Wellbeing Board in the past.
4. I have made contact with the following organisation/charity to ask for an overview (if possible) on air quality and it’s dependency on the IBC May 2016 Traffic Report <http://www.environmental-protection.org.uk/policy-areas/air-quality/air-pollution-and-planning/>
Environmental Protection UK is a national charity that provides expert policy analysis and information on air quality, land quality, waste and noise and their effects on people and communities in terms of a wide range of issues including public health, planning, transport, energy and climate.

Air Quality

“Our Air Quality Committee lobbies on key legislation and policies which affect air quality, human health and the environment. The Committee also develops guidance on key issues for members.”

Appendix C- Marked up and comments added- Specialist CBRE Air Quality report in Environmental Impact assessment Statement (attached file) Chapter 10 On Air Quality

... there to protect everyone especially the vulnerable

Appendix D

Development means more air pollution



■ An artist's impression of Ipswich Garden Suburb.

Picture: ARCHANT

Sir, - Re: the Ipswich Garden Suburb. It appears that more questions are being raised by the public than answers are available!

What the concerned public needs to know is: Will the borough be able to make this workable, and will they ensure the landowners and developers pay for the health impacts which recent evidence states will result? Will "polluter pays" requirements be enforceable; as to date, within the Ipswich Garden Suburb SPD Masterplan, this issue is yet to be properly quantified in terms of adverse health impacts, reduced life expectancy and related care needs and loss of work costs to the local economy?

How does Ipswich Borough Council plan to protect the health of the children and staff of St Margaret's Primary School in Bolton Lane from the inevitable increase and exceedances of traffic emissions, both nitrous oxide and particulates from diesel, from the conservative estimates of 7,000 extra traffic movements from the northern fringe proposals? This extra traffic is highly likely to use Westerfield Road and Bolton Lane, already identified as serious air pollution EU and DEFRA AQMA air quality management areas, to reach the town centre?

Recent figures from Public Health England, the government health advisers,

estimated that 29,000 deaths every year in the UK can be attributed to air pollution. Committee chair Joan Walley believes this is "a huge issue that is not being addressed". So, how can this primary school avoid this impact? What is the school's governing bodies' response to these proposals? What are our local public health experts saying? As EU "exceedances" of air pollution events within Ipswich are increasing with existing population traffic volumes, how will the council deal with this further pressure from the northern fringe?

BARBARA ROBINSON,
Save Our Country Spaces,
Tuddenham.

BEN GUMMER MP



HOUSE OF COMMONS

LONDON SW1A 0AA

10th February 2015

I would like to update you on recent developments with the Northern Fringe. Since I last wrote to you, I have been in extensive discussions with the developers and landowners of the various parts of the Northern Fringe, with Ipswich Borough and Suffolk County councils, with Design South East - the design panel charged with assessing the design quality of the Northern Fringe, and with residents and residents' groups.

First, in September, Ipswich Borough Council passed its masterplan for the Northern Fringe without significant alteration, despite the hundreds of representations they have received from residents, from consultees and from me. I asked them to delay adopting the plan so that they could look again at the issues that I and others had raised - on the lack of cycle and road infrastructure, on the location of the school, and on the quality of the scheme. I was very disappointed although not surprised that they decided to press ahead regardless, the result of which is that we now have a substandard masterplan as the blueprint for the northern fringe.

The inadequacies of the masterplan were shortly exposed by the outline planning application by Mersea Homes, on behalf of CBRE, for 815 homes to the west of Westerfield Road but beneath the railway line, known as Fonnereau; they also lodged a detailed application for the first 80 homes. The applications made clear that congestion would rise by at least 15 minutes per journey on Valley Road (although they rather disingenuously claimed this had nothing to do with new houses); as worryingly, the applications also realised residents' fears about the quality of a new development.

All of this was profoundly concerning. The Borough have adopted a poor masterplan which has produced an inevitably poor planning application, one that indicates the damage that could be done to the town by poor development on the Northern Fringe.

However, since then, you will be glad to know that I have made some limited progress in resisting these plans.

First, after several meetings I held with senior offices and councillors, Suffolk County Council (SCC) lodged a very strong objection against the two applications, 'owing to inadequate evidence, particularly transport and drainage, and a lack of a clear strategy to deliver strategic infrastructure'. It is good to see SCC reflecting and responding to my and residents' concerns.

Second, SCC's report makes clear that the Northern Fringe will lead to 'significant increases in congestion and delay across the highway network and deteriorating conditions for all road users.' As a consequence, SCC have stated that new road infrastructure will most likely be required both across the Wet Dock and also 'additional road capacity to the north of the town centre'. It is significant that SCC has accepted that Ipswich will need considerable investment in infrastructure if new development is to go ahead. These are not just words, moreover, SCC is commissioning a study of what new roads may be required, to be produced in the next few months.

What progress)

Third, following meetings I have held with senior executives in London, CBRE - who own the southern part of the site - have withdrawn the detailed planning application they put in for the 80 houses immediately to the west of Westerfield Road. This leaves their application for outline planning consent for the larger area, and Ipswich Borough council has agreed with CBRE to delay determination of this until September. The withdrawal of the detailed application and delay of the outline application are both extremely significant. It indicates that there is now a realisation that all aspects of the scheme must be reconsidered. As importantly, we now have more time: time to look again at the need for new roads and cycle ways to support the Northern Fringe, and time for the developers to think hard about the concerns local people had about the quality of what they were proposing.

I feel that we have at least slowed the super-tanker; we may even have started turning it round. Not much will happen this side of the election, as councils will soon go into purdah and campaigning will begin in earnest. I am clear though about my priorities: I will continue to fight against poor development to the north of Ipswich and should I be re-elected on 7th May, I shall on 8th May re-commence my efforts on your behalf. Our pressure is beginning to show results; together, we can achieve the best for Ipswich and for you, the residents who will be most affected by the Northern Fringe.

Ben Gummer
Member of Parliament for Ipswich

Appraisal for SOC- Roger Richards¹⁷ former Principal Engineer with Ricardo Consulting Engineers.

He has worked on various engine areas, from Stirling engines through alternative fuels and artificial intelligence applied to condition monitoring. He is responsible for the development of novel techniques for improving efficiencies and emissions of large engines.

“I’ve read through the AQ report. It’s very poor.

I’ve put it into a Word document so that I could add comments. This document with my comments is attached.

Here’s a summary of the main flaws in the document:

1.By their own admission, the authors have only modelled the situation up to 2015, not 2031 as required to make realistic forecasts.

2.Neither the source of the input data, nor the assumptions made in interpreting it, are specified.

3.The key findings are given in Section 3.3 of the report. These consist of estimates of the risk of non compliance with air quality limits. The methodology used to arrive at these estimates is unexplained. Furthermore, there is no indication of the impact of the proposed developments in the Local Plan on these supposed results.

4.The “Model Verification” given in Appendix B is inadequate. There is only a collection of tables and graphs, with no explanation whatsoever. It is therefore impossible to tell if the model has in fact been properly verified.

5.The Local Plan Site Proposals are listed in Appendix C, but nowhere in the report is it made clear how, or even if, the impact of these developments on air quality has been considered.

Any one of these failings would render the report unreliable. Taken together they render it completely meaningless.”

17 Roger Richards Opinion on the IBC May 2016 WSP report- Appendix F