

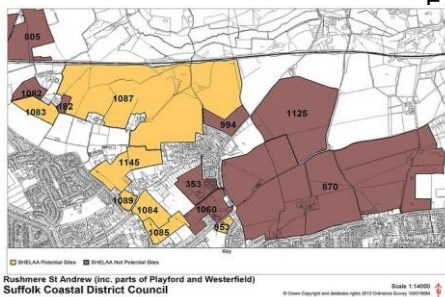
Matter !. Note on Sustainability Appraisal (SA) and Habitat's Regulation Assessment Save Our Country Spaces At a time of national & international crisis Sustainability does not necessarily mean growth and more houses.

The main concern SOCS have is in relation to **cumulative and compound impacts and risks (NPPF 6-17)** in relation to **Climate Change/and Adopted Climate Emergency Action Plan^{1/} Transport/Air Quality/(Noise Pollution)/ Flood** and risks from **Foul drainage/Surface Water** run off, both ongoing and during construction phases, which is not properly assessed.

Environment Impacts are assessed later- a '*cart before the horse*' approach and misguided solution.

Suffolk Climate Emergency Plan Transport & Air Quality assessment and information is vital to Inspectors.

SOCS say an attendant requirement or an **Ipswich Strategic Policy Area SA** (EastSuffolk/ Babergh/ MidSuffolk/ IBC) ;comprehensive & appropriate **IPSA Assessment and deliverable mitigation (with the necessary work spared by all parties equally)** to ensure 'sustainable' growth; we suggest this is absent from any of the 3 LA Plans. Adopted or emerging.



EastSuffolk Plan is now adopted but **Babergh/Mid Suffolk has just been submitted, their draft we read, indicated their refusal to cooperate with IBC.** This is unfair on IBC and may render both plans as unsound.

the true extent of the potential pressures from housing growth on Ipswich Borough can be seen from the East Suffolk map left in particular.

If IBC Plan area is added, including the comprehensive development onto the 1 metre wide lane Humber Doucy Lane/ Tuddenham Road critical junction area - from Westerfield House- full (38) and Outline² (149) permissions, -the detail of which shows traffic counts at peak *currently* to be very high- especially Tuddenham Road - constrained width and 2 railway narrow bridges, one humped back. SOCS note the conditions applied to transport for the Westerfield House permissions in 2014 are yet to be satisfied-in-part due to the "challenging" conditions pertaining.

Need?

B&MSDC resident's comment 'The INR has been proposed primarily in order to increase land for **housing, which is in excess of current housing needs assessments...**' If Ipswich is to be '**urban crammed**', where will they 'satisfy' their housing needs next? - there will be no space no flexibility no contingency to satisfy public health needs alone. Is there this actual level of need in Ipswich?

Ipswich demographic and Ipswich constraints –

Insufficiently acknowledged and factored into SA. Ipswich density of population **3,480 KM²** - others **MS- 118 /B 154 /WS 173 / ES 197** So why are Ipswich expected to **Urban CrAM** with their existing difficulties and constraints? High density of homes are planned for N Ipswich. No CCG agree Health Services seem on the horizon even for IGS- meaning more traffic movements, likewise schools in area are full, St Margaret's, Rushmere, Sidegate, Northgate, St Albans, so children will be driven outside area. Public Health severe impacts unaddressed/NICE WHO standards not met on Air Quality. Severe impact on existing and future resident's QOL.

Topography- The N of Ipswich feeds into the "basin" of Ipswich Town area, down towards the Docks creating a critical air quality pollution trap³ hence the **5 LAQMA's-** the proposals to develop Ipswich on this unsustainable scale will inevitably exacerbate pollution. Two Rail lines through from N to central add to the pollution and noise.

Flood risk- Tidal (Climate Change) Orwell and most important for proposals, Gipping Water course through From Humber Doucy Tuddenham Road area through IGS.

Transport Constraints- under stated by SCC and not reflective of existing available data (e.g. Tuddenham Road peak -approx 950 movements per hour), ignoring the constraints outlined in the DoT Manual for Highways Design (hump back Bridge) and second Tuddenham Road Rail bridge only 2 cars passing, not possible for lorries. Capacity challenges, constraints, access, connectivity constraints and road safety threats. Exacerbating current "rat runs" No recreational survey of roads like Tuddenham Road – which currently is a major cycling route – route from adjacent major sports facilities.

(School) **Illegal vehicle access to Tuddenham Road Gresham's Site, still lacking IBC enforcement for some 7 yrs or so.**

DoT Manual for design ignored by SCC in recent planning approvals. (re Westerfield Parish Council). Railway Crossing at Westerfield impacts on feeder roads to Ipswich – single lane with passing places, Church Lane Humber Doucy lane and no indication of increases rail to Felixstowe dock and Sizewell rail traffic movements.

Challenge SCC statement- '*there are no deal breakers.*'

N/ NE Ipswich Green Corridors, Green separation/ Green accessible Open Space

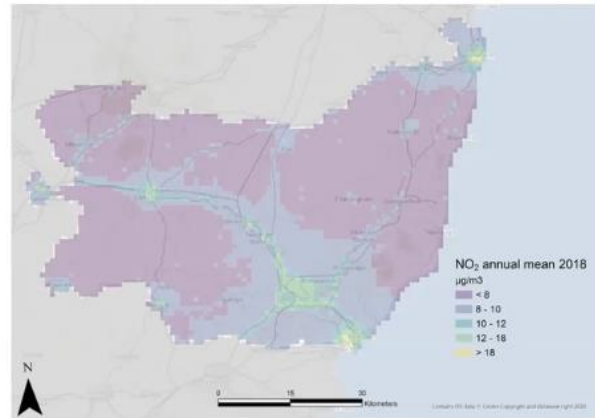
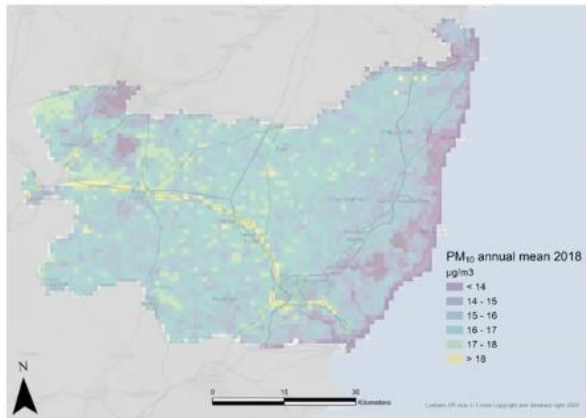
Identified longstanding deficit (1960's Shankland Cox Report) against S/W Ipswich exacerbated by E Suffolk and Ipswich Plans- Please look at Open Space and Ecological Map. Loss of Grade 2 & 3 Agricultural Land plus trees.ancient hedgerows wildlife corridors- despoiling heritage buildings and eradication of Red House Park one of the 5 great parks of Ipswich till 1940's comparable to Christchurch. Protected species on Red House Millennium Cemetery site area which is part of the Westerfield /Gipping water course. TPO in area.

Damage to **Fynn Valley CWS** due to excessive pressures from increased pop density in proximity. plus HRA matters and ripple effect- noticed recently during Covid Lock down). Villages like Tuddenham will be swamped and RTA's will increase (2 this week please note).

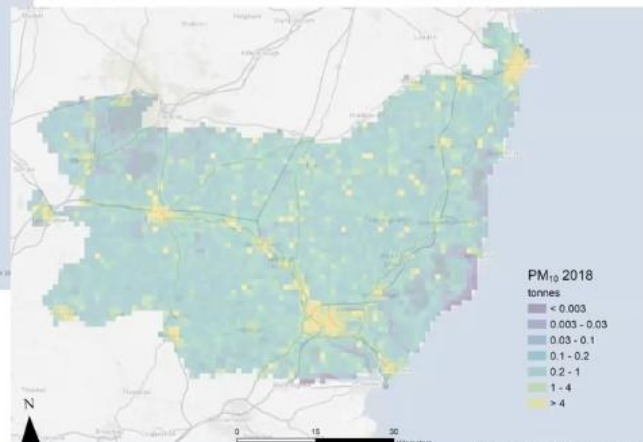
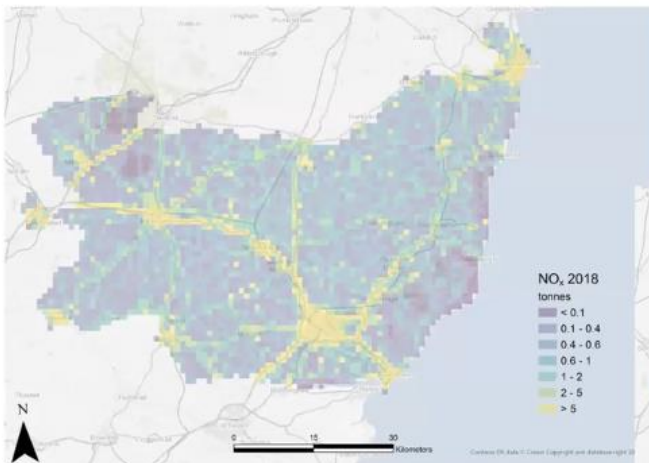
- 1 Suffolk Climate Emergency Plan Transport & Air Quality workshop, Wed 25th Nov <https://vimeo.com/483652776/c4f92d59af>
Suffolk Climate Emergency Plan: <https://www.suffolk.gov.uk/planning-waste-and-environment/initiatives/pledge-to-climate-emergency-declaration/>
- 2 file:///Users/barb/Downloads/IP_18_00526_OUT-1.pdf Transport Assessment Report
[capsvr2_planedms_BDB089D16E4A11E8BC6A8CDD44BE450.pdf](https://www.suffolk.gov.uk/planning-waste-and-environment/initiatives/pledge-to-climate-emergency-declaration/)
- 3 How can you support #JusticeForElla? <https://www.theguardian.com/environment/2020/nov/30/landmark-inquest-to-rule-if-air-pollution-killed-london-pupil> Landmark inquest to rule if air pollution killed London pupil New hearing into 2013 death of Ella Kissi-Debrah follows mother's seven-year fight Landmark AIR QUALITY case.

To summarise- I hope the Inspectors will recognise IBC dilemma, if it is indeed the economic hub, PLEASE GIVE IBC SOME SPACE TO BREATHE- to respond to Climate Emergency, Public Health Air Quality Critical Need, BREXIT and COVID. Make partner LA share the load and meet their obligations to plan strategically.

Air pollutant concentrations across Suffolk



Air pollutant emissions across Suffolk (2018)



Impact of pathway options on emissions

