

# Ipswich Borough Council Local Plan Review

## Topic Paper: Air Quality, Transport and Green Infrastructure

Evidence on the integration of policies for air quality, transport and green infrastructure

January 2019 (regulation 18 stage preferred options consultation)



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## Introduction

1. This topic paper brings together an overview of the connections between some different elements of local plan and other Council policies. Bringing them together allows the articulation of a common aim. To help us live a better, healthier, life in our town with a reducing reliance on the private car for our transport between places of residence, work and recreation.

## What the Council is doing

2. The Council is currently preparing a review of its adopted Core Strategy and Policies Development Plan Document (DPD) (February 2017) and Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD (February 2017). These documents form the Council's Local Plan, which guides future development in the Borough. The Council will prepare these documents to align them with those of adjoining Planning Authorities, which also sit within the Ipswich Housing Market Area.
3. Draft Preferred Options versions of the two plans are due to be published for informal public consultation between 16<sup>th</sup> January – 13<sup>th</sup> March 2019, under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
4. The Core Strategy and Policies DPD Review (referred to as the Core Strategy Review below) will replace the adopted Core Strategy and Policies DPD review when adopted (anticipated to be in late 2020).
5. The Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review (referred to as the Site Allocations Plan below) will replace the adopted Site Allocations Plan when adopted (also anticipated to be in late 2020).
6. The Council has a duty under the Environment Act 1995; Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007 and the relevant Policy and Technical Guidance, to regularly review and assess air quality and to determine whether or not the air quality objectives are likely to be achieved. Where these objectives are either not or not likely to be met, local authorities have a duty to designate affected areas as Air Quality Management Areas (AQMAs) and develop and implement an Air Quality Action Plan (AQAP). Ipswich has 5 AQMAs. At the time of drafting this topic paper, the Council has prepared a five year AQAP which will be presented to Council Executive in February 2019. The Government have also recently published their new Clean Air Strategy 2019 and proposed a new Clean Air (Human Rights) Bill (HL Bill 118) (1). As the AQAP is a live document, any developing changes in national policy deemed to influence the Council's approach to improving air quality through the AQAP within the five year period will be considered, with the AQAP being amended accordingly.
7. In addition to the above, the Council gives consideration to the guidance published by Environmental Protection UK and the Institute of Air Quality Management "Land-Use Planning & Development Control: Planning for Air Quality" (2) when commenting on planning applications with regards to air quality.

## National Planning Policy Framework – Plan Making

8. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF was revised in July 2018, implementing reforms announced previously through the Housing White Paper, the planning for the right homes in the right places consultation and the draft revised NPPF consultation. The NPPF is national planning policy and Local Plan documents such as the Core Strategy must refer to the principles established in the document.
9. The NPPF states in paragraph 35 that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are deemed to be sound if they are; positively prepared, justified, effective and consistent with national policy.
10. The Duty to Cooperate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty placed on local planning authorities to cooperate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. The duty to co-operate came into force on 15th November 2011 and any plan submitted for examination on or after this date will be examined for compliance. Local planning authorities are expected to provide evidence of how they have complied with any requirements arising from the duty. Non-compliance with the duty to co-operate cannot be rectified after the submission of a plan.
11. The NPPF makes clear that plans should apply a presumption in favour of sustainable development, i.e. plans should positively seek opportunities to meet the development needs of the area, including objectively assessed needs for housing as well as any needs that cannot be met within neighbouring areas.

## National Policy Context for Local policy making

12. NPPF 29 states: 'Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas'.
13. NPPF 35 states: Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to;
  - accommodate the efficient delivery of goods and supplies
  - give priority to pedestrian and cycle movements, and have access to high quality public transport facilities

- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones
  - incorporate facilities for charging plug-in and other ultra-low emission vehicles, and
  - consider the needs of people with disabilities by all modes of transport.
14. NPPF 102 requires that transport issues are addressed from the earliest stages of plan-making to ensure that the broad implications of planned development may be considered and any impacts on the transport network addressed.
  15. NPPF 103 states: The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
  16. In particular, NPPF 181 suggests 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. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
  17. This topic paper considers the positive outcomes that can arise from considering air quality alongside open space, habitat development and transport measures in new developments, while ensuring the delivery of corridors through the town that encourage walking and cycling as alternative to the private car for local journeys.
  18. Planning Practice Guidance on Air Quality remains unchanged since 2014 – it explains the important relationship between air quality and the planning system and the responsibility under EU legislation- including the 2008 Ambient Air Quality Directive - that stipulates limits to control major pollutants that impact public health. The Guidance also explains the need for local air quality management and the requirement to designate air quality management areas (AQMAs). Ipswich has followed the necessary procedures and has confirmed five AQMAs.
  19. Following consultation in 2018 the Department for Environment Food and Rural Affairs (DEFRA) has published the Clean Air Strategy 2019 (3) – It sets

out the Government's plans for dealing with all sources of air pollution, making our air healthier to breathe, protecting nature and boosting the economy. It offers a comprehensive range of actions across all parts of government and society to improve air quality.

20. The Council has given consideration to the Government's Clean Air Strategy 2019 and exercised its duty under the Environment Act 1995, and DEFRA's Local Air Quality Management Policy Guidance LAQM.PG16, (4) with the preparation of a draft Air Quality Action Plan and this too has been through a phase of public consultation leading to its (likely) adoption in 2019. The plan has four priority areas that will lead to improved air quality. These relate to :-
- Public health, behaviours and awareness – e.g. facilitating a modal shift away from private vehicles towards public transport and active travel, to improve air quality and create a healthy community.
  - Transport – Encouraging cleaner vehicles, including renewal strategies for the town's bus fleet, taxis and corporate fleets, to reduce poor air quality.
  - Policy, planning and infrastructure - By embedding air quality measures into policy development, planning applications and major developments.
  - Wider strategic approach- Reducing exposure to air pollution by tackling the sources of pollution from further transport initiatives and domestic sources.

#### Local Responses to global issues – some evidence

21. Traffic moving around a town can flow easily or sometimes it can grind to halt under the weight of congestion. Flowing traffic will create some pollution – slowing and stopping traffic, sitting in congested roads creates more pollution still. Pollution in the air makes people unwell and this represents an increasing cost to the NHS. Last year, transport was responsible for 26% of the CO<sub>2</sub> emitted in the UK. (5)
22. The UN World Meteorological Office has confirmed that the twenty hottest summers on record have occurred within the last twenty years and the hottest top four years were the last four years. (6) These raised temperatures can have a serious effect on the health of people going about their normal business, especially those who are vulnerable by way of age or ill health. Similarly, Ipswich is likely to face additional issues arising from rising sea levels. While these trends may have a number of arguable causes there are simple and inexpensive things that we can do in Ipswich that can improve our way of life while making a contribution to improving the UK/global picture.
23. The Local Plan should therefore do all that it can to help slow the process of global warming in whichever way it can and no matter how small the contribution it can offer. For this reason the topic paper has had regard for the contents of "Air quality and climate change – Integrating policies within Local Authorities." (7)
24. As explained above, air quality has been given a stronger profile in the national planning guidance. The National Planning Policy Framework (NPPF)

promotes sustainable transport, suggesting that the growth of traffic created by development plan proposals should be considered from the earliest stages of plan-making. “The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”

25. The Department of Environment, Farming and Rural Affairs has responsibility for overseeing national air quality objectives and designated Air Quality Management Areas. The DEFRA website explains the important relationship between policies: Development Control, Air Quality and Climate Change, Air Quality and Health, Air Quality and Transport, Air Quality and Industry, Air Quality and Local and Regional Strategies.
26. DEFRA also makes grant funding available to Local Authorities with one or more AQMAs. The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations was produced by the Government in July 2017.(8) It sets out the requirement for councils with the worst levels of air pollution at busy road junctions and hotspots to take robust action in the shortest time possible.
27. To support local authorities to deliver these plans, the government launched The Clean Air Fund on Friday 23 March 2018. (9) A broad range of options are suggested for local authorities to consider such as new park and ride services, concessionary travel schemes and improvements to bus fleets. A deadline for submissions has just passed at the end of November 2018 for projects that are to commence from March 2019. Funding will continue and similar bidding timetables are likely to continue in future years. The Local Plan and Air Quality Action Plan jointly would provide an appropriate context for such a bid to be framed.

#### The Ipswich response and Local Plan Policies

28. Ipswich has received a rich gift of municipal parks from the past. The town’s civic pride is still evident in the three main parklands: Chantry Park, Christchurch Park and Holywells Park.
29. There are also many hectares of smaller parks (such as Alexandra Park) and cemeteries that contribute to the verdant feel of the town. The historic planned growth has been characterised by spacious leafy suburbs laid out from the 1800s onwards and this heritage has been echoed in the layout of the inter war developments.
30. More recent development has maintained this commitment with open space being a formal requirement of successive local plans since 1997. These have contributed both formal and informal play areas, playing pitches and some specialist facilities including skate parks. The Orwell Country Park combined with nearby ancient woodland offers access for all to the beauty of the Suffolk countryside. The borough now has more than 500 hectares of open space and parklands – a scale usually associated with larger towns and some cities.

31. The Council has worked with Suffolk County Council, The Greenways Project and Suffolk Wildlife Trust (among others) to deliver and maintain a network of open spaces and footpaths. Through time, this has seen the Council well placed to help deliver on initiatives for Suffolk's biodiversity and cycling and walking which have been encouraged within the main town parks. The Council sets out a strategy through the Local Plan to repeat the quality of this environment in a "Green Rim" for the edges of the town as development opportunities create such opportunities. This term is explained in para 8.53 and in the Policy CS16
  
32. Ipswich is rich in biodiversity containing one internationally designated site (a Ramsar site and Special Protection Area for birds), three nationally designated sites (Sites of Special Scientific Interest for wildlife), 21 County Wildlife Sites and 9 Local Nature Reserves. The Suffolk Biodiversity Action Plan has developed the ecological objectives of the Suffolk Councils and their partners. The range of initiatives includes work in the parks and gardens with local schools, an active Park Ranger group and "Wild Ipswich" <http://wildipswich.org/> . The latter partnership's objectives include a strategic approach to planning matters in local plans and individual planning applications, looking after and improving existing wildlife sites and the identification of wildlife corridors throughout Ipswich.
  
33. There has also been a variety of cycling and walking initiatives built around the balanced transport plan for Ipswich and the "Sustrans" cycling initiatives for Suffolk. The initiatives have created a network that offers feeder routes into bus and train facilities and the connection of residential areas with other key facilities like schools, places of employment and the parks themselves across the town. The key aim was to encourage the "modal shift" by offering real alternatives to the family car for shorter cross or within-town journeys. This approach has been updated and built into the plan's Objectives (Ob6) and Ipswich Strategic Planning Area policies. (ISPA2 Strategic Infrastructure Priorities).

Policies and proposals provide for:

- i. existing green and wildlife corridors and open space provision to be protected;
- ii. new development to promote and enhance the biodiversity of the corridors and maintain the convenient working of cycling/walking routes that already exist; and
- iii. development proposals to encourage and enhance opportunities for the continued greening of the town to the benefit of current and future residents and visitors.

#### Public Open Space as connector in cycle and walking network

34. The Local Plan identifies the existing Green Corridors in Policy DM10 and reinforces the importance of ensuring connections across the town. An additional "Blue" corridor is promoted for the River Orwell and the concept / areas for a possible "green rim" are explained.



35. IBC will continue to work with its partners to provide advice on the opportunities for cycling and walking through the Local Plan process, master planning advice and during the Development Management process. To help in this the Council's Cycling Strategy Supplementary Planning Document gives guidance on providing cycle routes, parking and storage in new developments. [ <https://www.ipswich.gov.uk/content/cycling-strategy-spd-0> ]
36. The following table (as with others that follow below) is a review of the policies that are included in the Preferred Options Local Plan published in January 2019 and show the interactions needed to secure an integrated approach which will encourage people to walk and cycle more.

Policy	Title	Comment
CS5	Improving Accessibility	Enables access across town safely and conveniently by foot and by bicycle - work with the Highway Authority through the Local Transport Plan prioritise the development of an integrated cycle network.
CS3	IP-One	Focuses regeneration effort on IP-One Area where jobs and facilities are located close to homes, and public transport options are maximised
CS10	Ipswich Garden Suburb	Encourages green walking and cycling throughout the site and includes links to Westerfield station, provision of a country park and local/district centres, and extensive public open space throughout the site.
CS11	Gypsy and Traveller Accommodation	Sites should be accessible safely on foot and by cycle.
CS16	Green infrastructure, Sport and Recreation	Strengthens ecological networks that link inner and outer parts of the Borough by providing walking and cycling routes
CS20	Key Transport Proposals	Seeks improved cycling and walking routes between key nodes
DM10	Green Corridors	-The Council will seek to establish and enhance green corridors within the Borough

		and linking to adjacent open spaces and walking, cycling or riding routes. Lists the existing corridors -Seeks control over future development on or abutting river banks to ensure footpaths and cycle paths are maintained and improved. Reasoned justification at paras. 9.10.6 & 7 clarifies need for cycling and walking in the Green corridors and in any future green rim around the town.
DM11	Countryside	Countryside policy allows for development that contributes to the green rim and other strategic walking and cycling routes and wildlife corridors
DM12	Design and Character	Layouts and design to provide for cycling in usable public spaces
DM20	Transport and access in new developments	Encourages good permeability within new sites to promote cycling and walking. Please also see para 51 below
DM21	Car and Cycle Parking in New Development	Promotes the need for cycle parking facilities - to compliment other policies
SP15	Improving Pedestrian and Cycle Routes	Support improvements to pedestrian and cycle routes within the IP-One area and linking the town centre to residential areas and beyond.

Public Open Space and trees as a means of carbon mitigation and enhancing Biodiversity

37. The NPPF explains the Government’s expectation that policies and decisions should contribute to and enhance the natural environment. Para 170 anticipates the establishment of “coherent ecological networks that are more resilient to current and future pressures”. The opportunity to plant trees in existing and future open spaces can make a significant contribution to the local environment. The Council has signed the Woodland Trust’s “Tree Charter” and subscribes to the ambition to place trees and woods at the centre of our lives and communities. The increase in the Ipswich tree canopy has been a long term aim of the Borough Council and its plans and Tree Management Policy. (10)

38. The Interim Sustainability Appraisal Report (January 2019) for the Local Plan recommends the development of a coherent, high-quality and connected GI network extending throughout and beyond the Borough. This network could include all forms of GI such as parks, hedgerow and mature trees. Urban trees and other vegetation can directly and indirectly affect local air quality by altering the urban atmospheric environment. The ways in which trees affect air quality are

- Through temperature reduction and other microclimatic effects and the shade they offer is generally associated with contributing to cooler summer air temperatures. This is believed to improve air quality because emissions of many pollutants and/or ozone-forming chemicals are temperature dependent.
- the removal of air pollutants. Trees can remove gaseous air pollution either through uptake via leaf stomata or the plant surface. Once inside the leaf, gases diffuse into intercellular spaces and may be absorbed by water films to form acids or react with inner-leaf surfaces. Recent research suggests that the planting of trees along the sides of roads could reduce NO<sub>2</sub> concentrations in addition to providing amenity value.
- Trees can also remove pollution by intercepting airborne particles. Some particles can be absorbed into the tree, though most that are intercepted are retained on the plant surface. The intercepted particle is often re-suspended to the atmosphere, washed off by rain, or dispersed through leaf fall. Consequently, vegetation is thought to be only a temporary retention site for many atmospheric particles.  
<https://laqm.defra.gov.uk/laqm-faqs/faq105.html>

39. As warmer summers are an ongoing likelihood, the shelter and cooling new trees can offer will be important in the parks and streets of the town centre. As a “Tree Charter” town that cares for the trees we already have, the Council will also seek the planting of new trees that will act as “carbon sinks” as they add to the absorption of CO<sub>2</sub>.

The following table sets out the policies that reflect the way that the Council expects policies to aid delivery of elements of mitigation

Policy	Title	Comment
CS10	Ipswich Garden Suburb	Provision of a country park and extensive public open space throughout the site, which will include the planting of a variety of tree species.

DM1	Sustainable Construction	The policy encourages the use of green or blue roofs on buildings
DM6	Provision of New Open Spaces, Sport and Recreation Facilities	Requires the delivery of public open space in new development and as informed by reasoned justification para 9.6.2 – 10% of the space to be given to “soft landscaping and tree planting”
DM9	Protection of Trees and Hedgerows	Encourages protection and retention of existing trees in proposal sites, the replacement of existing trees removed to facilitate development on a two-for-one basis and new planting schemes as part of soft landscaping plans. RJ para 9.9.2 assists interpretation of the policy.
DM12	Design and Character	Sites should be designed to reflect the special characteristics and distinctiveness of Ipswich. Explanatory text para 9.12.8 and 9 clarifies the important contribution that trees make to the character of the town.

#### Public Open space as a place of recreation

40. Improved biodiversity and enhanced habitat also helps create the right setting for our own recreation and leisure. The Council will continue to manage its parks, gardens and open spaces so that wildlife and people can use the spaces. The NPPF has confirmed the importance of the social objectives of plan making including the achievement of strong, vibrant and healthy communities. Chapter 8 promotes healthy and safe communities who should enjoy access to “healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”
41. NPPF para 96 states “Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.” Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

42. The concept of well-being arising from the use of “green infrastructure” is becoming better understood. <https://www.designcouncil.org.uk/news-opinion/designing-good-mental-health-cities-next-frontier-urban-design> and the Borough’s own open space and biodiversity policy 2013 also made this connection - <https://www.ipswich.gov.uk/content/open-space-biodiversity-policy>
43. The Borough’s existing parklands and green corridors are a key element of provision for the local communities. In the spaces provided, formal and informal sports and other activities take place to the general benefit of public health. Space, shade and tranquillity can benefit the mental health of those needing the opportunity to take time out. The Council will seek to protect its open spaces through the plan period.
44. The following policies are relevant concerning the delivery of quality recreation opportunities planned for the borough.

Policy	Title	Comment
CS10	Ipswich Garden Suburb	Provision of a country park and extensive public open space throughout the site, which will include school playing fields, informal and formal public open space for recreational purposes, and allotments.
CS16	Green Infrastructure, Sport and Recreation	Safeguards the existing green infrastructure and ensures that our “parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community.” The Council will also enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk.
CS17	Delivering Infrastructure	To ensure that Public Open Space is delivered alongside new homes in the plan period the need for green infrastructure etc is stipulated among the broad categories of this policy that set out the Council’s expectations for on and off site infrastructure delivery plans
DM5	Protection of Open Spaces,	Sites will be protected from development unless tests indicate that the land is surplus to needs,

	Sport and Recreation	of low or poor quality and can be replaced with alternative and improved facilities.
DM6	Provision of New Open Spaces,  Sport and Recreation Facilities	Requires the delivery of public open space in new development.
DM10	Green Corridors	Seeks to maintain the network of open spaces and walking, cycling or riding routes, whilst adding to the network with similar facilities in the “rim” around the town.

45. There are several of the Council’s other strategies that have an effect on the Council’s Local Plan policies and proposals. These include “The Play Strategy”, “The Allotments Strategy” and the Council’s Cultural and Leisure Services Business Plan. In order to provide facilities balanced with their catchment population and a programme of financial investment, these documents come under continuing review. The Council’s Culture and Environment team are planning for a rebased review of sports and Leisure facilities during 2019.

Transport - initiatives and mitigation of transport generated Air Quality issues

46. The previous paragraphs have focussed on the way that Public Open Space and the policy-led green corridors can promote better public health by offering the chance to walk and cycle and opportunities for recreation. In addition, the benefits arising from these policy initiatives will also be regarded as an element of possible mitigation for development led pollutants. However, as explained in paragraph 13 above, the Council must also have regard for the effects of transport and plan for growth without it giving rise to the deterioration of our environment or air quality. This section deals with the related issues of Transport on our local road network and on local air quality.
47. Air Quality modelling was completed in 2016 in relation to locations identified for future development under the Ipswich Core Strategy and Policies Development Plan Document Review, and Ipswich Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (the Ipswich Local Plan, 2017). The document concluded that :-
- in relation to air quality objectives, the risk in 2015 related only to NO<sub>2</sub>. Concentrations of PM10 and PM2.5 were well below objective levels and therefore not a risk. Looking at the long-term trends, annual mean concentrations of NO<sub>2</sub> appeared to be declining;

- further investigation was needed to confirm baseline air quality conditions in areas where locations had been identified as medium or high risk of NO<sub>2</sub> exceedances;
- highway based measures should be investigated to avoid traffic conditions in the future that may result in a new, or sustain an existing, air quality problem. Highway based measures could include improvements to junction configuration, setting priorities for certain vehicle types, dynamic signal controls and intelligent transport system technology amongst other things; and
- increased use of cycling and walking in place of the private car would also assist in reducing the level of risk. Further understanding of the sources of the emissions (e.g. contributions from different types of vehicle) would assist in targeting effective mitigation measures.

Continuing improvements to emissions were likely to, at least in part, mitigate emissions from the modelled increase in traffic waiting times at certain junctions in peak hours.

48. The impact of traffic growth in Ipswich has been modelled to support the Local Plan Review process and the current version of the assessment is known as Model Run 8. This models the effects of planned growth in the Suffolk Coastal Final Draft Local Plan January 2019, the Ipswich Preferred Options proposals November 2018, and development options for Babergh and Mid Suffolk. The Upper Orwell Crossing (TUOC) has been included in the traffic modelling process, in a method predicting traffic growth “with” and “without” TUOC in the assessment scenarios, in the light of the County Council’s current review of the project.
49. The modelling suggests some worsening congestion on key A14 junctions at the am / pm or both peaks and some further resultant junction congestion in Ipswich. (11)
50. The Borough Council and Suffolk County Council are currently commissioning updated Air Quality modelling that will follow on from the completed traffic modelling. Due to the Council’s shared timetable for delivery of aligned plans this is only likely to be possible between the current Regulation 18 (Preferred Options) and Regulation 19 (Publication draft) stages. At this time more detailed information will be available from the joint Babergh and Mid Suffolk Local Plan to indicate the broad location of their main development proposals.
51. The Local Plan Review Preferred Options sit alongside the Council’s draft Air Quality Action Plan which looks beyond planning at other measures including corporate measures that can be put in place to improve air quality. The Council’s AQ action Plan will be scrutinised by DEFRA, having been subject to public consultation in late 2018.
52. The Council maintains its commitment to mitigating the impact of traffic congestion arising from development. In addition to the quality of design and layout that offers permeability and accessibility for cycling and walking

through new development, Policy DM20 provides that it should also offer safe and convenient access to public transport. The policy also requires the introduction of electric vehicle charging points and a car club scheme provided that scheme viability is not harmed. The Policy concludes with the statement that “Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated. The Council will expect major development proposals to provide a travel plan to explain how sustainable patterns of travel to and from the site will be achieved.”

53. At this stage, the Preferred Options draft Local Plan Review sets out a range of measures to address air quality. The role of public open space and trees has been addressed through earlier sections of this paper, as have proposals to support cycling and walking. Alongside these policy requirements, the following policies are relevant to the issue of air quality and cover the design and access aspects of development, and access to public transport.

Policy	Title	Comment
DM3	Air Quality	Integrates Air Quality Action Plan activity with development management processes – requires Air Quality Assessment in specified applications and provides for mitigation and the imposition of obligations to achieve mitigation measures.
DM12	Design and Character	This general design policy allows for “greener streets”, public transport infrastructure and car parking for electric vehicles in well-designed development proposals.
DM20	Transport and Access in New Developments	Policy aims to reduce the impact of traffic congestion on the local road network, ensuring development does not result in a significant impact on air quality or an Air Quality Management Area;  Seeks to incorporate electric vehicle charging points and a car club scheme, or if not viable, the infrastructure to secure their future delivery,  promotes pedestrian and cycle accessibility to and permeability within new sites, ensuring that any new routes



		<p>are “coherent” and in accordance with the design principles of policy DM12;</p> <p>Proposals should have safe and convenient access to public transport within 400m, and facilitate its use through the provision of services, infrastructure and/or tickets where required.</p> <p>Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated and the Council will expect major development proposals to provide a travel plan to explain how sustainable patterns of travel to and from the site will be achieved.</p>
DM21	Car and Cycle Parking in New Development	<p>Seeks reduced maximum standards for car parking provision in residential development within the IP-One Area, which has frequent and extensive public transport networks, and easy access to a wide range of employment, shopping, and other facilities.</p> <p>Encourages alternatives by securing high quality, secure cycle storage, and within non-residential developments of more than 1,000 sq. m or where more than 50 people will be employed, high quality shower facilities and lockers.</p> <p>The policy requires cycle parking across the Borough to be secure, sheltered, conveniently located, adequately lit, step-free and accessible.</p>
DM33	Delivery and expansion of Digital Communications Networks	<p>Developments of 10 or more homes and other non-residential development should provide for the infrastructure for superfast and full fibre etc. broadband for the contribution they can make to the environment by reducing the need to travel (e.g. by supporting home working).</p>
SP9	Safeguarding land for transport infrastructure	<p>Safeguards the park and ride site at Anglia Parkway, and states that the Council will investigate the feasibility or park and ride at Ravenswood (at Airport Farm Kennels).</p>

## Conclusion

54. The plan will help to sponsor change by combining each of the objectives explained above and offering multiple benefits including :-
- real alternatives for cycling and walking that will provide for improved levels of activity and thus public health;
  - reduced reliance on the private car for shorter cross town journeys to the benefit of air quality and further public health gains
  - an enhanced green canopy and green or blue roofs providing a habitat “net gain”, and
  - a high quality environment for the enjoyment and mental well-being of users, including gains in terms of climate change resilience.
55. Although the borough benefits from a strong heritage of parkland gifted by earlier generations of “civic fathers” the current Local Plan Review must ensure that future development makes its own contribution to the overall provision. In doing so it will provide open spaces and recreation opportunities that are appropriate, meaningful, usable and accessible to the new communities and residents being planned for. The Local Plan Review has offered the opportunity to strengthen its policies in a manner that reflects the direction indicated by the NPPF 2018. The objective will be to bolster the borough’s existing network of corridors and open spaces by taking every opportunity afforded by development proposals as and when they become available.
56. The issue of Air Quality and the progress of the Council’s Air Quality Action Plan (12) will be updated for the next (Regulation 19) stage of Local Plan preparation.

## References

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