

**Statement of Common Ground between
Ipswich Borough Council as Local Planning Authority
and
Suffolk County Council as Highway Authority**

24 September 2020

Scope

1. This Statement of Common Ground identifies areas of agreement and seeks to find a way forward on areas of potential disagreement between Suffolk County Council (SCC) and Ipswich Borough Council (IBC) in relation to the SCC representations to the Final Draft Ipswich Local Plan.
2. In addition it seeks to establish a framework for additional work that is required for the delivery of the Final Draft Local Plan and to set up a procedure for monitoring progress against set project targets.
3. Identification of the key strategic matters to be addressed. Through the Statement of Common Ground.

Objective

4. The objective of this Statement of Common Ground is to secure agreement between the parties to ensure a satisfactory position regarding the matters of transport and parking in relation to the Final Draft Ipswich Local Plan. Specifically, this will cover:
 - Policy CS20 – Key Transport Proposals;
 - Policy DM21 – Transport and Access in New Developments;
 - Policy DM22 – Car and Cycle Parking in New Development; and
 - Policy SP17 – Town Centre Car Parking
5. The establishment of a satisfactory position will enable the submission of the Final Draft Ipswich Local Plan to the Secretary of State for examination.
6. IBC have worked with SCC at each stage of preparation of the emerging Local Plan Review to prepare a policy framework to address transport and highways matters over the Local Plan period.
7. As statutory consultees, SCC have been formally consulted at every stage of consultation of the emerging Local Plan Review and have provided constructive comments to IBC throughout the process. IBC have responded to comments raised by SCC at the relevant stages of the emerging Local Plan Review.

General response from IBC to additional information received to sites and issues raised

8. IBC support the response from the SCC Transport Policy & Development Manager and would like to make the following comments:

- Island Site (IP037) (Appendix 4) – This needs to be read in conjunction with the Ipswich Strategic Planning Area (ISPA) Statement of Common Ground under Section H (Transport Infrastructure) on page 19 which refers to the County Council contributing up to a maximum of £10.8 million to help deliver crossings to serve the Waterfront and deliver Ipswich Local Plan regeneration objectives;
- Humber Doucy Lane (ISPA4.1) (Appendix 5) – The policy relating to this site ensures comprehensive cross-boundary master planning for the site for both the IBC element and Suffolk Coastal Local Plan element together. On page 2, paragraph 2, of your representation, it is not clear what is meant by the comment “the larger development on the other side of the road.” and;
- IBC Smarter Choices Modal Shift (Appendix 6) – On page 2, the ‘summary in the ISPA Mitigation Strategy’, whilst it is accepted that the population is ageing, it needs to be recognised that Ipswich has an above average level of people of working age and so IBC would like this recognised in this section.

Notes

9. In relation to the sites at Ravenswood (ref IP150(a-e) and IP152), IBC are in the process of creating a comprehensive approach to master planning as a separate issue as raised at Regulation 18 (Preferred Options) stage. SCC made no formal representation at Regulation 19 stage on this matter on the understanding that further masterplanning work would be undertaken.
10. The matters of major infrastructure proposals (Table 8A), site specific early years and primary education provision, cross-boundary development (Policy ISPA4), flooding and water management, and archaeology have been addressed by way of a separate Statement of Common Ground between IBC and SCC.
11. Changes to policies suggested are designed to resolve issues but will need to be subject to Sustainability Appraisal before being adopted as modifications for consultation. Should there be any changes arising from this process IBC will contact SCC.
12. Insertions are shown underlined and deletions are shown in ~~striketrough~~.

Policy CS20 – Key Transport Proposals

13. SCC have raised an objection regarding the transport mitigation strategy and its relationship with the Final Draft Local Plan Review. Supporting representations are not included in this Statement of Common Ground.

Table 1 SCC Objection and areas of common ground regarding Policy CS20 of the emerging Local Plan Review, Regulation 19

Representation ID	Table Section/ Row	Representation	Specific Amendment(s) Requested	Areas of Agreement	Areas of Disagreement (including reasons if applicable)
26574	General	Reference to the Transport Mitigation Strategy for the ISPA is welcome and supported, as is the focus on sustainable transport measures. SCC Transport Model highlights that growth in Ipswich and surrounding districts may cause severe impacts on the highway network within and around Ipswich, which cannot be addressed through improvements to the highway alone. The County Council considers the appropriate strategy to be maximising sustainable transport in order to achieve a significant proportion of modal shift in both the new and existing population. The Suffolk County Council Transport Mitigation Strategy needs to be included in the Local Plan evidence base.	N/A	<p>IBC agrees that maximising sustainable transport in order to achieve a significant proportion of modal shift in both the new and existing population is the appropriate strategy. This is agreed in the Ipswich Strategic Planning Area Statement of Common Ground.</p> <p>The SCC Transport Mitigation Strategy for Ipswich Strategic Planning Area will be included as part of the evidence base when the emerging Local Plan Review is submitted to the Secretary of State.</p>	N/A

Policy DM21 – Transport and Access in New Developments

14. SCC have submitted the following objection to the Final Draft Ipswich Local Plan Review Policy DM21 (Transport and Access in New Developments) regarding the threshold for when travel plans are required in new developments. Supporting representations are not included in this Statement of Common Ground.

Table 2 SCC Objection and areas of common ground and potential amendments regarding the threshold for requiring travel plans as set out in Policy DM21 the emerging Local Plan Review, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement (IBC suggested modification(s))	Areas of Disagreement (reasons if applicable)
26598	DM21	DM21 is not in line with national policy in relation to the lack of explanation as to when travel plans are required. The importance of travel plans in achieving modal shift is stated in the SCC Transport Mitigation Strategy for ISPA. A similar approach should be taken with Travel Plans as for Transport Statements and Assessments. The Plan’s explanatory text should refer to the indicative threshold set out in County Council guidance, with the caveat that in some sensitive areas, e.g. affecting Air Quality Management Areas, full travel plans may be required where normally Travel Plan Measures would be acceptable.	See amendments to policy wording and reasoned justification set out in appendix 1 of this Statement of Common Ground.	IBC agrees with the two amendments proposed. IBC has added a small amendment “ <u>an appropriate</u> ”, to ensure proportionality for the scale of development.	N/A

Policy DM22 – Car and Cycle Parking in New Development

15. SCC have raised the following objections to Policy DM22 (Car and Cycle Parking in New Development) of the Final Draft Ipswich Local Plan Review.

Supporting representations are not included in this Statement of Common Ground.

Table 3 SCC Objections and areas of common ground and potential amendments regarding Policy DM22 (Car and Cycle Parking in New Development) of the emerging Local Plan Review, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement (IBC suggested modification(s))	Areas of Disagreement (reasons if applicable)
26584	DM22	The central parking core is defined in the IP1 area policies map. The West of the town centre (outside the core) has predominantly been for long stay parking (associated with offices/station). DM-22 states that no non-residential long stay car parks will be permitted. It is not clear whether this applies to the whole IP1 area or just the central parking area. The supporting text clarifies that it is for central parking core but to avoid inadvertently encouraging car use and increasing congestion, the control of the supply of additional long-stay spaces must be extended to the whole IP1 area.	The changes suggested have been subject to internal informal discussion.	Policies DM22 and SP17 have been amended with a presumption in favour of no net increase of parking spaces other than that identified through the Parking Study (3 additional spaces to 2036) and to ensure that on-street long term parking is not permitted outside the Central Parking Area, unless it can be demonstrated that the provision does not negatively impact on modal shift objectives. The policy as amended also reflects the NPPF in terms of 'severe' being the threshold for determining the impact on the highway network (see Appendix 2 for detail).	N/A
26584	DM22	Whilst there is some definition of operational parking through reference to staff parking not being included (para.9.22.8), examples of what would be included would provide a positive position. This could include spaces	See amendment to paragraph 9.22.8 as shown in Appendix 2 of this Statement of Common Ground.	IBC agrees to the changes as proposed.	N/A

		for deliveries, visitor spaces and potentially spaces for staff who use private transport for visiting clients for example. The county council would welcome the opportunity to discuss how the approach to operational and staff parking within the IP1 area could be effective.			
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Policy SP17 – Town Centre Car Parking

16. SCC have raised the following objections in relation to Policy SP17 (Town Centre Car Parking) of the Final Draft Ipswich Local Plan Review.

Supporting representations are not included in this Statement of Common Ground.

Table 4 SCC Objections and areas of common ground and potential amendments regarding Policy SP17 (Town Centre Car Parking) of the emerging Local Plan Review, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement (IBC suggested modification(s))	Areas of Disagreement (reasons if applicable)
26640	SP17	IBC's 2019 WYG parking report assumes a lower rate of traffic growth than that forecast by the Local Plan modelling, even accounting for modal shift. Greater clarity is needed on how the spatial strategy responds to the WYG finding that care is needed to ensure that the proposed level of parking does not inadvertently encourage car use.	See amendments to policy wording and reasoned justification set out in Appendix 3 of this Statement of Common Ground.	See above.	N/A
26640	SP17	The “like for like” replacement approach at sites IP051 and IP015 needs clarification to avoid undermining restraint on long-stay provision. Policy needs to shorten any period of additional provision between a multi-storey being opened and a site redeveloped, to support sustainable travel efforts.	See amendments to policy wording and reasoned justification set out in Appendix 3 of this Statement of Common Ground.	See above.	N/A

Signatures

Signed 

Name: Martyn Fulcher

Position: Head of Development

Date: 24th September 2020

Ipswich Borough Council

Signed 

Name: James Cutting

Position: Head of Planning

Date: 24th September 2020

Suffolk County Council

**POLICY DM21:
Transport and Access in New Developments**

To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:

- a. not result in a severe impact on the highway network or unacceptable impacts on highway safety, either individually or cumulatively;
- b. not result in a significant detrimental impact on air quality or an Air Quality Management Area and address the appropriate mitigation measures as required through policy DM3;
- c. incorporate electric vehicle charging points, including rapid charging points in non-residential developments;
- d. provide a car club scheme or pool cars, where this would be consistent with the scale and location of the development;
- e. prioritise available options to enable and support travel on foot, by bicycle or public transport, consistent with local strategies for managing the impacts of growth on the transport network, and ensuring that any new routes are coherent and in accordance with the design principles of policy DM12 and local walking and cycling strategies and infrastructure plans;
- f. have safe and convenient access to public transport within 400m, and facilitate its use through the provision or contributions towards services or infrastructure;
- g. protect the public rights of way network and take appropriate opportunities to enhance facilities and routes;
- h. ensure safe and suitable access for all users, including people with disabilities and reduced mobility;
- i. allow for the efficient delivery of goods and access by service, refuse collection and emergency vehicles and bus permeability; and
- j. mitigate any significant impacts on the transport network.

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 an appropriate travel plan to explain how sustainable patterns of travel to and from the site will be achieved. Development proposals will be accompanied by a satisfactory Transport Statement or Transport Assessment, which demonstrates that the cumulative impacts of the development after mitigation are not severe.

9.21.1 The Council is keen to ensure that new developments have an acceptable impact on and relationship to existing transport infrastructure. Therefore the above will be important considerations in determining planning applications. The Council will need to be satisfied

that impacts can be managed in a satisfactory way, sustainable modes have been prioritised and that suitable additional infrastructure provision is made where necessary.

- 9.21.2 Ipswich is a regional transport node and a compact town and therefore it should be possible to access the town centre and other parts of the town by sustainable means. In accordance with the Ipswich Strategic Planning Area (ISPA) Transport Mitigation Strategy, the Council is keen to ensure that a modal shift away from the car can occur within the Borough. The main elements of the ISPA Transport Mitigation Strategy are listed in policy CS20. This policy should also be considered alongside the growth aims of the Local Plan Strategy, principally policy CS2.
- 9.21.3 The Council will need to be satisfied that the impacts can be managed in a satisfactory way and that suitable additional infrastructure provision is made where necessary. Where relevant, development should take opportunities for providing new infrastructure through well-designed cycle and pedestrian routes. It should also link with public transport facilities and services and seek to improve existing rights of way to reduce journey times to employment, schools and services and support active travel.
- 9.21.4 The Suffolk Rights of Way Improvement Plan is under review. The 'Suffolk Green Access Strategy' will replace 'In Step With Suffolk' and set out the aims, objectives and delivery plans for a further 10 years. This Council also expects development on sites which abut or relate closely to the town's rivers to provide for the improvement of public access alongside these. The Public Rights of Way network is more than just a means of reducing vehicular traffic. In addition to connecting areas and providing opportunities for physical recreation and social interaction, it provides vital access to services, facilities and the natural environment. In this sense it is a major recreational resource, economic asset and means of promoting mental and physical health. These benefits must be taken into account in the design of development along with the contributions it might make to sustainable routes and open space provision. Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made. This Council also expects development on sites which abut or relate closely to the town's rivers to provide for the improvement of public access alongside them.
- 9.21.5 Necessary mitigating measures to improve public transport infrastructure and services may be secured where this would reasonably relate to a development, whilst the introduction of car club schemes or pool cars in larger developments may also contribute to reducing levels of private car ownership in the town (the need for car club provision in new developments will generally be informed by the agreed findings of a Travel Plan). Criterion e. of the policy would not be applied unreasonably if limited parts of a development were unavoidably slightly further than 400m from public transport. The inclusion of electric vehicle charging points in residential plots,

employment and retail developments and commercial car parks are also considered a sustainable measure that can help to reduce greenhouse gas emissions in line with the aims of the National Planning Policy Framework. The provision of charging points for electric vehicles within new developments should be made in accordance with the Suffolk Guidance for Parking (November 2015, amended May 2019).

9.21.6 The Council promotes the provision of car club spaces due to their proven ability to reduce car ownership and, in particular, second car ownership. Similarly, the Council will seek low emission vehicle infrastructure in the form of active electric vehicle (EV) charging points.

9.21.7 Additionally, new developments containing communal residential parking facilities, retail development and employment development should aim to deliver active charging capacity in accordance with the Suffolk Guidance for Parking. The proportion of rapid charging points will be specified through the Low Emissions Supplementary Planning Document, taking into account viability considerations. In terms of car club spaces, 100 per cent of such spaces should have the passive capacity for eventual EV charging. Further details of the Council's EV and car club approach are to be outlined in the emerging Low Emissions Strategy Supplementary Planning Document.

9.21.8 In proposals for the development of 30 to 49 dwellings, 1,500 – 2,499 sq. m B1, 2,500 – 3,999 sq. m B2/B8, or 800 – 1,499 sq. m retail a transport statement will generally be required with a planning application. For development of or exceeding 50 dwellings, 2,500 sq m B1, 4,000 sq m B2/B8, or 1,500 sq m retail, a transport assessment will generally be required. Some smaller sites, in very sensitive locations, may require a transport assessment due to significant traffic impacts. Conversely, some larger sites may not give rise to significant impacts if they are in parts of the network that are not likely to be under pressure. A long term management strategy (Travel Plan) to increase sustainable patterns of travel to a site will also be secured in some instances. The degree of negative impact of a development will be determined by the Council in conjunction with the Highways Authority on a case by case basis, as this will also depend on the spatial context of the individual planning application under consideration. The County Council's Suffolk Travel Plan Guidance, which contains indicative thresholds, will be used to determine the need for an appropriate Travel Plan or Travel Plan Measures. Some smaller sites which do not meet the requirements for a full Travel Plan, but are in sensitive locations may require a full Travel Plan to help mitigate traffic impacts.

9.21.9 Where a development is likely to have an impact on an Air Quality Management Area or other sensitive area, an assessment of the air quality impacts of the development will be needed with appropriate mitigation measures proposed as necessary. Policy DM3 sets out the requirements in relation to air quality. Confirmation on the level and extent of transport and highways reports that would be required to support development proposals can be found within the Council's Validation Checklist.

POLICY DM22: Car and Cycle Parking in New Development

The Council will require adopted standards of car and cycle parking to be complied with in all new development (except in the IP-One area), and will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities and create a safe and attractive environment. The Council will also require the provision of integral secure cycle parking in any new car parks in the town.

Car parking must be designed so as not to dominate the development or street scene or to result in the inefficient use of land.

There will be maximum standards of car parking provision with no minimum requirement for 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.

A central car parking core will be defined in the town centre, through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. Within the central car parking core, only operational car parking will be permitted in connection with non-residential development, so that the stock of long-stay parking is not increased. New, non-residential long-stay car parks, and on-street parking, will not be permitted within the central car parking core.

Within the whole IP-One Area, proposals for additional long-stay car parking provision over and above that proposed through policy SP17 will not be permitted, unless the proposal can demonstrate that it would not harm the effectiveness of modal shift measures outlined in the SCC Transport Mitigation Strategy for the Ipswich Strategic Planning Area; or, have a severe impact on the highway network, which cannot be adequately mitigated.

New development will provide 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. These facilities should also be provided in minor non-residential developments unless it can be demonstrated that it is not feasible or viable. Cycle parking across the Borough is required to be secure, sheltered, conveniently located, adequately lit, step-free and accessible.

9.22.1 Ipswich has a strategic objective to improve accessibility (CS5). This policy provides further requirements in terms of the quality and quantity of car and cycle parking provision. Standards for provision outside IP-One will be as set out in the Suffolk Guidance for Parking (2019) and any subsequent document.

9.22.2 Cycling is an increasingly important and sustainable means of travel. The Council will therefore expect cycle parking to be safe, convenient and secure and preferably subject to natural surveillance, so that users of a development are more likely to use bicycles to travel to and from a site. Where relevant, development should take opportunities for providing high quality cycle storage with workplace shower and

locker facilities. Details regarding cycle parking standards and design can be found within the Suffolk Guidance for Parking (November 2015, updated May 2019).

- 9.22.3 The emphasis on provision for both residential and commercial development relates to more strategic measures being taken across the town to improve cycle routes, through the Local Transport Plan and the Ipswich Cycling Strategy.
- 9.22.4 An explicit requirement to set maximum car parking standards is no longer part of national planning policy. This previous approach has led to parking on verges and on street in a number of recent developments, to the detriment of the street scene and highway safety.
- 9.22.5 Local planning authorities are now free to apply parking standards that are appropriate and necessary to address local circumstances. In Ipswich, the standards within the Suffolk Guidance for Parking (November 2015, updated May 2019) are currently being applied. Standards for residential parking within IP-One will be identified through the Low Emissions Strategy Supplementary Planning Document, which is under preparation.
- 9.22.6 Whilst the emphasis of transport policy remains firmly on encouraging people to switch to more sustainable modes where possible, it is also recognised that many people still own cars. Therefore, adequate levels of residential parking should be provided that uses land efficiently and is designed in from the outset to ensure that cars do not dominate the street scene. Underground parking is also an efficient way to accommodate the car and should be considered where this is acceptable in flood risk terms as demonstrated through a Flood Risk Assessment. Car parking can be appropriate in areas subject to flooding, provided that flood warnings are available and signs are in place. When considering car parking within flood risk areas, the ability of people to move their cars within the flood warning time should be considered. Boundary treatments such as railings should ensure that if vehicles become mobilised during a flood event, they are contained within the confines of the site but still allow the free movement of flood water. Long-term and residential car parking is unlikely to be acceptable in areas which regularly flood to a significant depth due to the risk of car owners being away from the area and being unable to move their cars when a flood occurs.
- 9.22.7 There are a number of publications which look at the design of car parking in more detail, notably 'Car Parking: What Works Where' (English Partnerships, 2006) and 'Manual for Streets' (Department for Transport, 2007). Where communal parking is necessary, rear parking courtyards should be avoided unless they are well-designed and overlooked. Owners should preferably be able to view their vehicles from active rooms within the building. Secure By Design guidance should be followed when providing underground parking to ensure that it is safe and secure.
- 9.22.8 In order to reduce congestion, manage air quality and encourage a modal shift away from the car, particularly amongst the commuting public, it is important to limit long-stay car parking within the central car parking core and control its provision across all

of the IP-One area, and for organisations to encourage employees to travel to work by more sustainable means through travel planning. Therefore, only necessary operational parking will be allowed for new non-residential development within the central car parking core. This excludes staff parking but would include access which is considered essential, for example: spaces for deliveries and visitors, spaces for staff who use private transport for visiting clients, spaces for school contract buses on education sites and spaces for setting down patients at health centres.

9.22.9 Outside the Central Car Parking Core but within the rest of the IP-One area, proposals for additional long-stay and on-street car parking provision over and above that proposed through policy SP17 of the Site Allocation and Policies (incorporating IP-One Area Action Plan) Development Plan Document will not be permitted, unless the proposal can demonstrate that it would not harm the effectiveness of modal shift measures outlined in the SCC Transport Mitigation Strategy for the Ipswich Strategic Planning Area; or, have a severe impact on the highway network which cannot be adequately mitigated. Evidence would be expected to include modelled data on vehicle movements as a result of the proposal, and, evidence of measures taken to encourage sustainable travel such as smarter choice interventions and travel planning. Suffolk County Council Travel Plan Guidance¹ provides further information on how this may be achieved.

¹ <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/2019-02-01-FINAL-Suffolk-Travel-Plan-Guidance-Web-Version.pdf>

Appendix 3: Policy SP17 with proposed amendments

Policy SP17 Town Centre Car Parking

The Council will pursue a town centre car parking policy with the twin aims of supporting the economy of the town centre and limiting congestion, through encouraging the use of sustainable modes of transport.

To this end, a Central Car Parking Core is identified on the IP-One inset policies map. Within this area, Core Strategy Review policy DM22 shall apply. *Within the whole IP-One Area, there will be no net addition to long-stay car parking provision, including on-street parking, over the plan period.*

Sites are allocated for multi storey car parks providing additional short stay shopper and visitor parking or long stay commuter parking as specified below:

- a. IP015 West End Road – long stay parking;
- b. IP048 Mint Quarter – short stay parking;
- c. IP049 No 8 Shed Orwell Quay – long stay parking; and
- d. IP051 Old Cattle Market, Portman Road – long stay parking.

The provision of a multi-storey car park at site IP015 West End Road will replace the existing on-site surface parking. It will also replace existing long stay parking at IP051 Old Cattle Market, Portman Road, if this is not replaced on site through redevelopment.

All new permanent car parks will be required to achieve good design and quality, and include electric vehicle charging points and variable messaging technology.

Proposals for additional temporary car parks within the town centre will not be permitted. Proposals to renew existing planning consents for temporary short stay public parking within the town centre will not be permitted when the permanent provision allocated above has been delivered. *In order to ensure no net gain in long stay parking spaces, the Council will link the release of new parking spaces through the above sites to the expiry of temporary permissions.*

~~Until then,~~ Temporary car parks will be expected to achieve the same level of quality as permanent ones.

- 5.7 Promoting sustainable transport choices is important to tackle congestion in Ipswich and its associated disadvantages for businesses, the environment and human health. It is also important for equality and inclusion, as 27.8% of Ipswich households do not have access to a car or van (2011 Census ONS Table KS404EW) and therefore it is important that public transport services can be sustained through high levels of use. Car parking policies are an important tool, alongside other planning and transport measures, to promote sustainable transport choices.

- 5.8 At the same time, providing sufficient car parking of good quality in the right places is essential to support the vitality and viability of the Central Shopping Area and enable it to compete with other centres, out of centre shops and internet shopping.
- 5.9 It is important to weigh the need to control car parking in Ipswich town centre with the need to support the town centre economy. Ipswich town centre also serves a rural hinterland where car ownership is higher and public transport services are less available. In the three adjacent districts to Ipswich, the average percentage of households with no car or van available is only 13.1%.
- 5.10 The provision of public car parking provision within central Ipswich has been reviewed through a parking study, which will inform the preparation of an Ipswich Parking Strategy. The study identified that central Ipswich contains approximately 6,817 public, off-street car parking spaces in and around the town centre (including 147 disabled spaces). Some 4,885 of the spaces within the study area provide the option for long-stay parking with the remaining 1,932 providing for short-stay parking only. Pricing mechanisms are used as a disincentive to using short stay car parks for long stay visits.
- 5.11 Short stay car parks support the economy of town centre and culture and leisure based activities. Through the Local Plan, the aim is to ensure a reasonable supply of conveniently located and reasonably priced spaces. Short stay is defined as up to 5 hours. Short stay car parks may be located within or outside the central car parking core.
- 5.12 Long stay parking is mainly for commuters. The aim is to discourage commuting trips from entering the town centre, in order to manage the morning and evening peaks, whilst recognising that there needs to be some supply for those commuters who will only or can only drive (some or all of the time).
- 5.13 The ~~emerging~~ findings from the parking ~~strategy study~~ (which does not differentiate future demand in terms of long or short stay) suggest a net ~~deficit~~ increase of just three spaces by 2036 ~~in central Ipswich of fewer than ten spaces~~. Geographically, the areas of deficit are in the vicinity of the railway station and office quarter around Russell Road, the Waterfront and in the north of the town centre. The Council is preparing an Ipswich Area Parking Plan to indicate how new, permanent parking provision will be made to replace the existing temporary spaces, in accordance with the evidence. In doing so, the Council will have regard to the County Council's Transport Mitigation Strategy for the Ipswich Strategic Planning Area and emerging action plan to ensure that parking is considered as part of a comprehensive approach to sustainable travel into central Ipswich.
- 5.14 The principle reflected through this policy is to allocate sites to meet the need for additional capacity in locations at the key entry points of the town centre. This approach seeks to limit drivers ~~'churn'~~ looking for appropriate spaces and needing to drive across the town centre. ~~These could be single sites offering both long and short~~

~~stay or they could be separate sites, outside the parking core if they are long stay car parks, and inside the core if they are short stay car parks.~~

- 5.15 The policy aims to strike an appropriate balance between providing sufficient, correctly priced car parking to encourage shoppers and visitors into Ipswich town centre, without adding to the burden of congestion or undermining sustainable travel options. Whilst short stay temporary car parking has been allowed on a number of sites awaiting redevelopment within the town centre, it is considered that any more would undermine work to encourage mode switching. Therefore, the policy does not permit additional provision of such car parking. And the number of existing temporary permissions will reduce as the multi-storey development identified in the plan takes place, and through the decision to not support further temporary permissions. This will result in ensuring greater control of parking spaces overall to meet the Council's strategy ensuring that long-stay parking avoids the need to enter the core of the town centre.
- 5.16 The policy approach to long stay car parking is to ensure that there is no net gain in the number of spaces over the plan period. In order to support the Suffolk County Council Transport Mitigation Strategy, there will also need to be a mechanism in place to link the new parking provision becoming available to the cessation of temporary provision. The Council will achieve this through conditioning planning permissions for new car parking provision to release new spaces only as temporary permissions expire.
- 5.17 This needs to be linked to the equivalent number of new parking spaces provided so that there is no net gain of additional parking spaces in each zone identified in the strategy.
- 5.18 The National Planning Policy Framework states that local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists (see policy SP15).
- 5.19 The number of spaces to be provided at the sites allocated will be determined in relation to the delivery of additional floorspace in the town centre for the main town centre uses and spaces being lost to redevelopment. Short stay parking is that which provides for shoppers or leisure visitors visiting the town centre for part of a day or evening, whilst long stay parking is whole-day parking for workers. The difference is usually established by the location and pricing structure of the car park. When designing proposals, consideration should be given to Secured by Design guidance relating to car parks.

Appendix 4: SCC Comments on Island Site (IP037)

IBC LOCAL PLAN – ISLAND SITE

Thoughts in response to feedback from ABP regarding the need for a new all user link over the New Cut to Felaw St to enable the planned island sited development to come forwards.

1) The Local Plan modelling has assessed 421 dwellings and 606 jobs at the island site – they are only in the 2036 scenario. The Local Plan trip rates mean that this is something in the order of 300 to 350 vehicle movements, which the Local Plan modelling had all using the existing link to St Peter’s Dock (the new vehicle bridge is not modelled).

2) The location of the site currently as a single point of vehicular access to the north. This access enables vehicles to turn left in and left out onto Bridge St. For those vehicles wanting to turn right, they need to access College Street via Foundry Lane.

3) With regards to how the local network operates in MR7 of Transport View – these are the results:

- The exit off the island experiences some pressure – this is due to vehicles right turning up Foundry Lane (this is far more of an AM peak hour issue which would be expected due to the one-way restrictions on both Foundry Lane and College Street). The capacity issue is resolved with the modal shift adjustment, this is generally because the flows are quite low;
- A number of links in the area are approaching capacity (the gyratory is obviously reasonably sensitive). This is the case in both peak hours, meaning any increase in traffic on those approaches will result in increased pressure (redistributed traffic).
- There is also pressure at the Vernon Street / Bridge Street signals in the AM peak hour.

4) Any assessment of impacts needs to understand the relationship between Foundry Lane, Vernon Street signals and the development. Also to be mindful of an increase in traffic on this one-way section and to understand the developments impacts on the gyratory and the Vernon Street signals. It is expected that a number of junctions approaching capacity in the area will be put under additional pressure as a result of the development. Due to the location of the island site in the town centre highway network, it is likely that there will be changes to the network over time, this could affect the impact of the development when it comes forward and the mitigation required.

5) It would be possible to undertake further modelling of the development and location utilising the WSP town centre paramics model.

6) On the sustainability element – There is a good argument that whilst the location of the site is sustainable its permeability is obviously not (without a bridge across the New Cut it’s a 400m walk to the northwest and a 600m walk to the southeast to leave the island, so although the site is right in the middle of town, it is not readily accessible by sustainable modes). Further work looking at isochrones of the walk distances to/from the centre of the site, with and without each access could provide further support for an additional link.

7) In terms of the need for two accesses for emergencies, if the current swing bridge over the lock is maintained and guaranteed to be available for access by all users if required, in preference to boat access through the lock; this route would provide the additional access required.

8) In summary, the local plan has modelled the delivery of the Island Site development for 2036. It is highly likely that the local highway network will change over the ensuing period which could

influence the need for a new vehicular crossing of the New Cut. The question therefore may be whether this is a full all user bridge or a bridge for sustainable travel rather than no bridge. Therefore, at this time the bridge should remain, and the requirement determined once the site comes forward. The scope of mitigation required will depend on the detail of the development application, which will include the provision of a bridge over the New Cut, and the extent of modal shift achieved across the town.

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Appendix 5: SCC Comments on Humber Doucy Lane (ISPA4.1)

ISPA 4.1 Northern End of Humber Doucy Lane

This site comprises 4 discrete areas within the Ipswich BC boundary and the further area allocated in the SCDC Local Plan. The sites within IBC have been assessed as having capacity for just under 500 dwellings and associated infrastructure.

Humber Doucy Lane is semi-rural at this location without the benefit of footways along some of its length. The site is on the edge of Ipswich and careful consideration will be needed to ensure the future residents of the site have adequate access to local services.

The site will need to be master planned comprehensively, including the SCDC LP allocation, to ensure vehicular access and connectivity for sustainable modes. This will need to include access for bus services with a potential bus gate. The site is edged along Humber Doucy Lane by an established hedgerow which will be required to remain and be enhanced by the development. Any access junctions to serve the site will need to be planned to minimise disruptions to this hedgerow ecology corridor. For this reason, access to the parcels will need to be taken from a consistent internal network of streets and avoiding multiple access points along Humber Doucy Lane. The most northern IBC section does not have frontage on Humber Doucy Lane, only Tuddenham Road, and the proximity to the railway bridge would make a separate access difficult to deliver, therefore access is likely to only be deliverable through the adjacent SCDC parcel of land, and further IBC phases. Therefore, the whole site must be master-planned from the outset to ensure safe and suitable access can be achieved.

The parcel on the junction of Humber Doucy Lane and Tuddenham Road would also require an access on Humber Doucy Lane as it would be too close to the existing junction to serve from Tuddenham Road. The site does present an opportunity to improve the Tuddenham Road junction, which current has restricted visibility. An amended junction would also need to provide pedestrian facilities so that the phases to the east and west of Humber Doucy Lane would have adequate connectivity. The junction parcel alone would be very difficult to provide for pedestrian access, without linking routes through the larger development on the other side of the road.

The key local destinations are to the south of the site, off Sidegate Lane. Rushmere Hall Primary School is on Lanark Road, Northgate Secondary and Sixth Form School is on Sidegate Lane. Both would require safe crossing points on Humber Doucy Lane, probably traffic signal controlled. Either by use of a pedestrian phase on a signal controlled junction or as a standalone Puffin / Toucan crossing. The most direct route from the larger site is via Inverness Road, which is lightly trafficked and has adequate pedestrian facilities. A crossing could also be required on Sidegate Lane, but this road is more lightly trafficked than Humber Doucy Lane, which lower traffic speeds, being urban in nature. Therefore, a Zebra crossing could be considered, consistent with the similar raised facility near to Northgate. The district centre on Selkirk Road, which has a good range of local shops and facilities, is around 15 minutes walk (0.8 miles) from the edge of the site. The masterplan and pedestrian access

strategy needs to provide a safe and suitable walking route to this facility, potentially with a crossing point, if not integrated into the site access junction.

Vehicular traffic has multiple routes from the site, either along Tuddenham Road to the A1214 Colchester Road or along Humber Doucy Lane to Sidegate Lane, Rushmere Road or Woodbridge Road. It is likely that traffic from the site will dissipate through the network, minimising local pressure points.

The SCDC portion of the site borders the Green Lane from Seven Cottages Lane to Tuddenham village, this recreational route is very well used, and give access to open countryside and promoted walks like the Fynn Valley. This bridleway route could be enhanced through surfacing improvements to provide a safe traffic free route for cyclists wishing to commute to Ipswich from Tuddenham and the hamlets surrounding it. The route is designated for cycling already but the surface is gravelly, and the route has some step section more suitable for off-road leisure riding, however modest improvements would make it more suitable for a wider range of cyclists to use. The alternative road route is derestricted and also has an extremely steep hill at the Tuddenham end.

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Appendix 6: SCC Comments on Smarter Choices (Modal Shift)

IBC LOCAL PLAN – SMARTER CHOICES (MODAL SHIFT)

Information relating to the modal shift element of the ISPA mitigation strategy is provided below. Modal shift is required for the existing Ipswich population to enable travel associated with the development related population from the ISPA local plan reviews.

Methodology and Background for Smarter Choices

Officers reviewed existing mode share, alongside transport modelling for the 2026 and 2036 horizons. Using the modelling outputs to identify sectors of the ISPA geographical area where a high level of cross sector and short distance car trips are occurring.

Undertook a peer review of all available literature, including academic research and published evaluations of behaviour change projects related to travel and transport choice, both local and national. There is widespread public support (perhaps now even more so) for measures to improve the range of sustainable transport options available and reduce the impact of traffic as a result of growth.

In terms of reducing congestion, improving air quality, increasing active travel for personal health benefits, removing barriers faced by low income households and making transport accessible to all sectors of the population, sustainable transport is able to achieve all of these whilst not becoming a barrier to supporting growth and development. This is one of the Council's key priorities to enable inclusive growth in Suffolk.

Analysis of the Census data also reveals that around 50% of commuter trips are less than five kilometres in length, which suggests there is significant scope to encourage more widespread uptake in cycling and public transport use in the existing population if infrastructure is improved alongside development, or in advance to facilitate uptake by the current population.

The Department for Transport has reported a long-term downward trend in the number of commuting trips, although the distance travelled has risen slightly. The net effect of this, despite economic growth and population growth, is a decline in annual commuting journeys from 8.5 billion to 7.9 billion (2017 figures)

This is likely to be down to a number of factors, including but not limited to;

- Workers are commuting to work fewer days per week
- There has been growth in the number of workers who do not have a fixed usual workplace
- Working from home is growing both on an occasional and usual basis, as technology and social acceptances increases
- Part-time and self-employment has grown, which generally have fewer commute trips

It has been long known and evidence suggests that there are key points in life, such as moving into a new home or a career change, are pivotal moments and are one of the best opportunities to affect behaviour change, but the alternatives need to be in place from day one (if not before). Otherwise, those whose needs are highest in terms of influencing travel behaviour will either not be attracted to the area or will not have the opportunity to embed active travel and public transport use into their lives.

The Essential Guide to Travel Planning (DfT)

DfT Best Practice suggests on average a 15% modal shift can be achieved among employees who work for organisations that implement a Travel Plan. Because travel plans are so effective for small outlays, national planning guidance now says that all planning applications with significant transport implications should be covered by a travel plan. Businesses looking to expand or relocate will often find that a travel plan is required by the local planning department.

<https://webarchive.nationalarchives.gov.uk/20110504043814/http://www.dft.gov.uk/pgr/sustainable/travelplans/work/essentialguide.pdf>

The following academic evaluation of a wide range of projects to address positive modal shift was commissioned by the DfT. It looks at the balance of capital against revenue investment to achieve and sustain an uptake in sustainable travel options.

It is hypothesised that at the programme level, there should be an inverted-U relationship between the proportion of revenue expenditure and the maximum achievable benefit-cost ratio (BCR). That is, the highest benefits are likely to come from a mixed deployment of capital and revenue. Importantly, the report notes that projects that are 100% capital did not achieve the same BCR value as those with a revenue/capital mix.

Finding the Optimum: Revenue / Capital Investment Balance for Sustainable Travel Report to Department for Transport Sloman L, Taylor I, Wilson A, King N, Goodwin P, Anabel J, Davison S, Crawford M, Cope A and Adcock S (2014)

Evidence on effects of smarter choice interventions

In the period between about the mid-1990s and mid-2000s, there was a major expansion of new types of initiative designed to change people's travel patterns towards more sustainable modes using a combination of infrastructure, targeted information, new services, marketing and promotion. This included development of workplace travel planning programmes, school travel planning, personalised travel planning, travel awareness advertising campaigns, public transport marketing schemes, car sharing services, car clubs, and, subsequently, many other variations on the same themes, such as station travel plans, residential travel planning, and so on.

The largest assessment to date of the effectiveness of these types of interventions remains Cairns et al. (2004), the 'Smarter Choices report'. This included an extensive literature review citing about 300 sources and reported on 21 in-depth case studies of smarter choice interventions, including workplace, school and personal travel planning, public transport

information and marketing, car clubs, car sharing and travel awareness campaigns. The case studies examined were estimated to have cost in the order of 0.1 – 10 pence per car kilometre saved, with an average of 1.5 pence, giving an indicative ‘congestion only’ benefit-cost ratio of about 10. No distinction was made between revenue and capital elements of the case study projects, but in general those case studies which involved a larger amount of infrastructure (hence capital) tended to have somewhat higher costs per car kilometre saved than those that did not involve significant new infrastructure and hence were mostly revenue.

From the summary in the ISPA Mitigation Strategy

It is evident that an aging population, changes to working patterns and a rise in relative deprivation are emerging and/or developing trends within Ipswich and Suffolk. There is, therefore, a need to consider the impact of these within the development of mitigation measures as they will ultimately impact upon travel and transport needs. 3

An aging population and an aging workforce determine the need to accommodate a wide range of mitigation measures, with changes to working patterns influencing the potential for peak spreading.

Evidence of an increase in relative deprivation highlights the need to improve access to employment, further education and training, and to improve the affordability of transport for the lowest income households.

Sources

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Appendix 7: Minutes of the Joint IBC/SCC Meeting on the Transport and Parking SoCG and the Infrastructure SoCG 23 June 2020, 3pm

Agenda Item	Actions/Issues Raised	Responsibility for action
<p>1. Transport and Parking SoCG – areas for consideration as highlighted (full changes to Policy and lowercase text at Appendix)</p>	<ul style="list-style-type: none"> • JC raised the issue that the temporary p.p.'s for temporary car parks formed part of the transport modelling. Agreed to ask for an explanatory note from WSP. • Minor word changes agreed 	<p>JC</p>
<p>2. Infrastructure SoCG – need a paragraph as highlighted as your response – overview for function; areas for consideration as highlighted; (full changes to Policy and lowercase text at Appendix) and comments</p>	<ul style="list-style-type: none"> • CC outlined the background to Halifax Primary School extension for early years. • JC regarding Bibb Way said that delivery is not fixed procedurally for an early years setting at the site and asked SM to provide contact details to JC who would facilitate discussion with the right officer at SCC to explore other delivery models. • CC explained that SEND schools can straddle primary and secondary settings • CC explained that pooling restrictions had been lifted for 6th forms. IBC developer contributions were based on the number of dwellings plus the cost multiplier. CC said he would check what Babergh/Mid Suffolk had contributed • CC explained that Copdock junction improvements were all paid for by Highways England. 	<p>SM/JC</p> <p>CC</p>

	<p>SCC had also done work to support the Suffolk Coastal Plan modifications. This work would be completed by 10 July and he would share that for our Infrastructure Table so ISPA authorities were treating this in the same manner.</p> <ul style="list-style-type: none"> • CC said that there were drawn up proposals for the central library and he would investigate associated costs. <p>NB all work required is indicated on the updated draft SoCG. It was recognised by all that this required the most work and in part was due to COVID-19.</p>	<p>CC</p> <p>CC</p>
<p>3 Highways update – Ravenswood; Humber Doucy Lane; Island Site</p>	<ul style="list-style-type: none"> • SM raised the issue of the allocated park and ride site at Ravenswood in relation to JC’s comments about viability at the last meeting. JC said that he had spoken to the Head of Highways, who said that this would not be a conventional park and ride site but was a bus halt with additional low-level parking which would serve Ravenswood, the employment area and would link to the town centre. Therefore, was not an issue. • JC said he had spoken to highways and that strategic options for a comprehensive approach to the Ravenswood site could be prepared to meet SM’s timescale. • CH confirmed that the Bus Partnership updated agreement had been signed on 25 May by all the main parties: SCC; IBC; Ipswich Buses and First Buses • SM explained the work required for the Humber Doucy Lane site 	<p>SB</p>
<p>3. AOB</p>	<p>None</p>	