

Matter 1 - Duty to Co-operate and Legal Compliance **Not attending**

SCI and Consultation 7. Has consultation on the ILPR been undertaken in accordance with the Council's adopted Statement of Community Involvement and the minimum consultation requirements in the Regulations? What evidence is there that representations submitted in response to the Draft Local Plan have been taken into account as required by Regulation 18(3)?

Representation 26494 (and from IBC's review of the summaries of our Representations and IBCs proposed main modifications)

We are concerned that the final draft of the Plan and the proposed modifications representations fails to adequately reflect our issues and concerns, especially in relation to traffic, air quality, modal shift, and infrastructure delivery but also town centre retail space. This has been a common theme for many years on the numerous Local Plan and other IBC consultations on these issues. Over the past decade, IBC has clearly failed to improve air quality or to achieve noticeable modal shift changes having taken insufficient action to deliver real projects and new infrastructure, yet it continues to generally ignore our protestations and informed consultation responses. If IBC had reflected our concerns and acted upon them, it would be in a far stronger position to deliver the Plan and Ipswich would be a much better place for it. Yet again, IBC has ignored our requests to specify the infrastructure in the Plan that is required to prevent unacceptable congestion, deliver high modal shift levels, and meet legal air quality targets and is necessary to make the Plan sound. IBC has still not provided details for the delivery of new infrastructure to achieve the required levels of modal shift. Similarly, over the past ten years, IBC has ignored our calls to provide more detail in the Plan on the required foulwater infrastructure in Ipswich without which the proposed growth, and in particular the Ipswich Garden suburb (such as pumping stations and off-line storage), will not be delivered. Inclusion of this infrastructure will clearly help focus minds and facilitate timely delivery.

We are also concerned that the summary of our representations fails to fully reflect our concerns with these issues. Obviously, we recognise that these are "summaries" so will not include all the detail. When considering our submitted Hearing Statements, cross-reference to our detailed consultation response would be more appropriate than to the representation summaries provided in A16 & A17.

Sustainability Appraisal

Representations 26493, 26496, 26509, 26512, 26525, 26514, 26494, 26513, 26538

8. Has the formulation of the ILPR been based on a sound process of sustainability appraisal (SA), as set out in the SA Report of the Final Draft of the ILPR, dated October 2019 [A4], and the SA Addenda, dated June 2020 [A5] and October 2020 [I13]? In particular:

Does the SA test the Plan against reasonable alternatives, in terms of its overall strategy for growth and development, site allocations and policies?

b. Has the SA been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?

c. Is the SA decision making and scoring robust, justified and transparent?

d. Has the Council provided clear reasons for not selecting reasonable alternatives?

e. Is it clear how the SA has influenced the ILPR strategy, policies and proposals and how mitigation measures have been taken account of?

f. Have the requirements for Strategic Environmental Assessment been met, including in respect of the cumulative impacts of the plan?

The SA fails to identify that the Local Plan will not deliver the infrastructure required to meet transport requirements, deliver modal shift, or improve air quality in a timely manner. Without such infrastructure, along with required delivery dates, being specified in the infrastructure tables there is a major risk that the Plan will not be delivered. We also note that the SA fails to identify that the traffic modelling excludes construction and trades traffic arising from the new development in the Plan, so will considerably underestimate the impacts on existing infrastructure and the need for new and improved infrastructure. The SA

fails to assess the environmental impacts of construction and construction traffic, most notably regarding air quality, and is not robust enough in this respect.

The SA fails to identify that the traffic and air quality modelling assume new road infrastructure will be delivered by 2026, which is earlier than the actual planned delivery dates for some schemes. The outline planning Conditions for the Henley Gate and Fonnereau developments specified by IBC in the Decision Notices have identified trigger points for junction/road improvements, which when cross-referenced with the planned phasing of the Ipswich Garden Suburb (Topic Paper reference I6), show when the road infrastructure is actually planned to be delivered. Delivery of this key infrastructure is mainly due after 2026, later than the delivery dates assumed in the modelling, as shown below.

Trigger Point	Road infrastructure improvements etc	Indicative date from I6 build schedule
Henley Gate		
299 homes	Henley Rd and Dale Hall Rd junctions with Valley Rd	2025/26
600 homes	Westerfield Rd/Valley Rd junction	2027/28
699 homes	IGS Road Bridge	2028/29
Fonnereau		
399 homes	Westerfield Rd/Valley Rd junction	2028
499 homes	Tuddenham Rd/Valley Rd junction	2030

Similarly, the SA fails to identify that other modal shift projects/infrastructure to be funded by IGS Developers, through planning Conditions on the IGS, will also not have been delivered by 2026. However, the traffic and air quality modelling assume such projects will have delivered significant modal shift savings for existing Ipswich residents (as well as for new IGS residents) but clearly this will not be the case.

Consequently, the Plan does not sufficiently address the impacts of growth in the early years on air quality, climate change and health. We also do not believe the SA makes a robust enough assessment on the impact of growth on air quality in the early years of the Plan prior to 2026, before air quality levels should begin to improve through electric vehicle growth and tighter emission standards filtering through the national vehicle fleet. The SA also fails to identify the historic lack of any real progress and action from IBC in improving air quality and delivering modal shift (as evidenced in the latest Authority Monitoring Reports (AMRs) (documents E1 and E2), which clearly identifies a major risk of non-delivery.

The SA consequently fails to identify the over-reliance on modal shift (15% by 2026 assumed in the traffic modelling) to deliver the Plan and the extremely high risk that the required levels will not be achieved. We note that IBC has not yet provided evidence that this 15% change in modal shift by 2026 is achievable and has not provided details of the key modal shift projects and funding sources to deliver it. In our opinion, the Plan can only be found to be sound when this evidence is available.

The SA does not adequately address IBC's non-compliance with legally binding Air Quality targets and IBCs lack of progress in delivering them. The new development proposed in the Plan will clearly add to current illegal levels of air pollution without additional remedial measures. The SA should be identifying these risks and the need for modal shift and air quality reduction targets in the Plan to help focus efforts in achieving the required improvement and recommending the inclusion of them in the Plan. The SA has therefore failed to adequately influence the ILPR strategy, policies and proposals and mitigation measures with respect to increasing modal shift and reducing air pollution.

In our opinion the Council's response to the SA recommendations on cycle and pedestrian routes etc is also insufficient to make the Plan sound. A greater commitment to delivering specific cycling and pedestrian routes that are safe is required from IBC to make the plan sound. IBC has not provided sufficient reasons for not doing so.

We believe that the SA has failed to take into consideration the potential for more homes in the town centre, rather than build on green field land on Humber Doucy Lane. In our opinion, IBC has over-estimated retail space and car parking requirements in the town centre and the Plan is unsound in this respect. Providing new homes on brownfield land is clearly more sustainable than building on green field land. This will also help regenerate the town centre and could help link the Waterfront with the main town centre. Building town centre homes will reduce the need to travel by car, help mitigate congestion and will be less damaging to air quality and the environment. Retaining green field land, will help preserve biodiversity and the associated benefits. Building town centre homes, rather than at Humber Doucy Lane, will remove the reliance on the delivery of IGS infrastructure and the need for new road development to deliver the site. The SA needs to make a proper and robust assessment of this alternative for the Plan to be sound.

Climate Change Policies

Representations 26493, 26507 (and those that reference the need for modal shift as this is a key carbon-reducing policy)

10. Does the ILPR, taken as a whole, include policies designed to ensure that the development and use of land in Ipswich Borough contributes to the mitigation of, and adaptation to, climate change in accordance with Regulations?

Whilst there are policies in place, there is a lack of identified infrastructure projects that will be required to deliver the required levels of modal shift to mitigate climate change. Specific projects that reduce transport carbon emissions need to be identified and included in the infrastructure tables for the Plan to be sound (see our comments on Matter2). The need for this is evidenced by the lack of progress (despite targets in previous Plans) on delivering modal shift (and hence reducing carbon emissions from transport) as reported in the new Authority Monitoring Report, 2018/19 May 2020 (E1).

- Table 9: Ipswich Carbon Emissions (2005-2017) shows just a small decrease in transport carbon emissions of 1.5%.
- Objective 6 Accessibility target - To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031 The assessment of progress against this *“The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review”* is clearly totally inadequate. We note that the Authority Monitoring Report, 2017/18 June 2019 (E2) contained the same comment.

Health Impact Assessment

Representations 26497, 26525, 26530 (our health impact concerns are related to illegal air quality levels)

11. Is the Health Impact Assessment [A9] of the Plan robust? Does it demonstrate whether the ILPR would have an overall positive effect on health and wellbeing in the Borough? Is any further mitigation of health effects required?

The Covid-19 pandemic has shown that it is even more urgent to improve air quality to meet legal requirements as poor air quality increases respiratory illness. The Local Plan needs to be strengthened to ensure that new developments do not worsen air quality in and around the existing AQMAs in the early years of the Plan to be sound. The HIA needs to assess whether air quality will be improved sufficiently in the early years of the plan to meet legal limits and prevent damaging health impacts. Specific air quality improvement projects (e.g. new and improved cycle lanes) in and around the existing AQMAs need to be included in the infrastructure tables. The HIA fails to identify that the new development proposed in the Plan will add to current illegal levels of air pollution without additional remedial measures. It is clear the Plan needs to strengthen its commitment to reduce air pollution to below legally binding limits to mitigate the damaging effects on health. Firm targets to reduce air pollution to legally binding limits are required to be included in the Plan for it to be sound. The HIA fails to assess the impacts on air quality of emissions from construction and construction traffic, which will need to be mitigated.