

## **Matter 2 – Spatial Strategy**

***Issue: Whether the spatial strategy of the ILPR has been positively prepared, is justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will enable the delivery of sustainable development in accordance with national policy?***

Representations 26493, 26496, 26497, 26507, 26509, 26534, 26506, 26522, 26494, 26531, 26523, 26532, 26533, 26536, 26495, 26511

### ***Infrastructure***

**29. Does objective 10 require modification to reflect the need to improve existing infrastructure as well as provide new infrastructure to meet increased demand from growth?**

Yes. A combination of improving existing infrastructure and providing additional infrastructure will be required to deliver the Plan. The Plan needs to provide evidence that this will be delivered in a timely manner for it to be sound.

**30. Is the ILPR effective in the provision of infrastructure and local services to meet future development needs? In particular:**

**a) Are the strategic infrastructure priorities and schemes identified in Policy ISPA2, Policy CS17 and Table 8A comprehensive and up to date, sufficient and justified as necessary to support the development needs of the plan, and deliverable over the Plan period?**

**b) Are there any types of infrastructure or schemes which may be required to support future needs missing?**

**c) Would the ILPR provide improved infrastructure and services to promote sustainable growth?**

No. Whilst we agree with the ISPA2 Strategic Priorities and that the infrastructure referenced in Policy CS17, they provide no detail and are therefore insufficient/comprehensive enough on their own. In our opinion, IBC has not provided sufficient evidence that it can deliver the required infrastructure (particularly by 2026) to enable the Plan to be deemed sound. More detail, as proposed below, is required in the Infrastructure Tables for the Plan to be sound.

We note that there is no cost for transport infrastructure included in Appendix 1: Approximate Cost Per Dwelling (July 2020) for Suffolk County Council Infrastructure Requirements of the Infrastructure Delivery Plan (I16). Most worrying is that Cycling and Pedestrian infrastructure needs are not even referenced in the Appendix. This does not inspire confidence that such infrastructure will be delivered in a timely manner for the Plan to be sound.

Table 8A fails to include key road, modal shift and foulwater infrastructure required to deliver the Plan. IBC needs to provide evidence that it can deliver the 15% reduction by 2026 modal shift<sup>1</sup> assumed in SCC traffic modelling for the Plan to be sound and to include specific modal shift infrastructure projects that will deliver this in the Plan. There has been little progress to delivering modal shift targets over the past decade despite the current Local Plan (22nd February 2017) and the previous Local Plan (December 2011) having targets to achieve a 15% modal switch for journeys in Ipswich by 2031 and 2021 (Objective 6) respectively. What evidence is there that IBC can deliver this 15% modal shift assumption? Without sufficient evidence the Plan is unsound. We note that the recent Authority Monitoring Report, 2018/19 May 2020 (E1) for Objective 6 Accessibility target - To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031 reported the assessment of progress against this target as *“The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review”*, which is the same comment as in the previous year’s AMR. This is clearly totally inadequate and implies IBC has done little or nothing.

As IBC has been working on modal for 10 years, we would expect IBC to have at least identified the modal shift infrastructure projects and funding sources required to do this. It should therefore be easy for IBC to

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<sup>1</sup> Tables 5.1 and 5.2 WSP/ Suffolk County Council ISPA LOCAL PLAN MODELLING Methodology Report (D37)

provide this detail in the infrastructure tables. If not, then why not? The only reason for IBC not to provide such evidence or detail on how it will deliver the required modal shift and air quality improvements would be that it does not know how it will do this. Without it the Plan is unsound. Please see our response to the CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW– FINAL DRAFT January 2020 for more details of our concerns that the 15% modal shift target by 2026 is unrealistic.

In the Statement of Common Ground (I18) between Ipswich Borough Council as Local Planning Authority, Suffolk County Council as Highway Authority and Highways England 30th September 2020 Table 1 A14 Junction Improvements references improvements to J53, 54 (along with J5) but Table 8A omits these. They need to be included in Table 8A for the Plan to be sound.

Table 8A should also include the highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 (D35) along with the dates they are required by. Alternatively, the IGS schemes could be included in Table 8B provided specific delivery dates were included as well. These 11 schemes (see below) are required to be implemented in a timely manner, as assumed in the traffic and air quality modelling work for the Plan to be sound.

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal (we question how this will improve bus services?)
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares
11. Europa Way link road We note this is the only project included in Table 8A

This list should also include improvements to the Henley Road/Dale Hall Lane junctions with Valley Road required for the IGS. It is not clear whether any of these projects are already included under "Measures to increase A1214 capacity" or what these measures might be; clarification is required here.

Section 3.9 IPSWICH RESULTS SUMMARY of the ISPA Transport Modelling Results Report (D35.2)<sup>2</sup> shows that even with the high levels of modal shift and new infrastructure many junctions will be unacceptably congested, especially on and around the A1214. What this modelling does not show is that these junctions are ALREADY at or near capacity. The modelling work also shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Rd and Dale Hall Lane as well as Park Rd, which are not designed for heavy traffic. How will IBC resolve these capacity issues for the Plan to be sound? Section 4.4 IPSWICH MODELLING RESULTS states "*there are still various junction approaches along the A1214 corridor around Ipswich are shown to be over or close to capacity in both 2026 and 2036. Junctions in and around the Star Lane gyratory are shown to have capacity issues in both forecast years. Other junctions which show overall capacity issues include Nacton Road / Landseer Road and the St Augustine roundabout (Bucklesham Road / Felixstowe Road).*" IBC needs to explain how it will mitigate these levels of congestion for the Plan to be sound and to include the required infrastructure in Table 8A.

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<sup>2</sup> [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/final\\_ispa\\_mr7\\_scc\\_hwy\\_results\\_report.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/final_ispa_mr7_scc_hwy_results_report.pdf)

Please see our response to the CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW— FINAL DRAFT January 2020 for more details of our concerns. We note 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. When assessing the infrastructure needs and identifying specific infrastructure requirements, the traffic modelling needs to model traffic associated with the construction of all development proposed in the Plan for it to be sound.

SCC's Transport Mitigation Strategy for the ISPA (D39) provides the cost estimates to 2026 for unidentified modal shift measures in Infrastructure Table 8A. These omit the technology costs which are referenced as "tbc" in D39 which states *"The use of technology will be considered for all mitigation measures and improvements, especially where it will provide a cost-effective mechanism to deliver the implementation programme and improve modal shift."* It is clear Technology infrastructure costs are likely to be significant and these should be included in Table 8A for it to be sound.

POLICY CS20: KEY TRANSPORT PROPOSALS (and Table 8A) fail to include the requirement for IBC to contribute to modal shift funding as identified in Section 10 of the Transport Mitigation Strategy. IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>3</sup> covers up to 2023/24 but fails to allocate any funding for, or even mention, improving air quality, delivering modal shift or improving cycle and pedestrian infrastructure despite the Plan being dependent on achieving 15% modal shift by 2026 and IBC being in breach of legally binding air quality limits. IBC needs to include its share of funding in Table 8A and provide evidence of where its share of funding, required before 2026, for modal shift infrastructure will come from for the Plan to be sound.

Table 8A also needs to reference that substantial funding will be required for sustainable transport measures and supporting infrastructure after 2026, which the SCC Mitigation Strategy states will be greater than that required up to 2026. IBC needs to indicate how it will deliver its share of the required funding post 2026.

We note that IBC's consultation response<sup>4</sup> to 19.CS5 – Improving Accessibility (pg 169) emphasises the importance of SCC's Walking and Cycling Infrastructure Plan<sup>5</sup> yet this has been omitted from the Evidence base. Why is this? This is a major omission that needs to be corrected and this key document needs to be available for examination as part of the Hearings. This clearly shows the existing walking and cycling infrastructure in Ipswich is poor, especially cycling infrastructure, whilst identifying the requirements and options for improvement. It assesses some of the key corridors but does not include any actions or funding to improve these. It will be impossible to achieve the required levels of modal shift without upgrading these key corridors to minimum standards of good design as cycling and walking in Ipswich is currently an unattractive, unsafe, incoherent, uncomfortable experience (although there have been some small improvements from Government's Covid-19 emergency funding). Please see our response to the CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW— FINAL DRAFT January 2020 for more details.

We also note that IBC's Cycling Strategy Supplementary Planning Document from March 2016 is mainly aimed at Developers and fails to provide for any new modal shift infrastructure. There is a clear gap in identifying, funding, and delivering the required modal shift infrastructure. Table 8A therefore needs to specifically reference the following key corridors (from SCC's Walking and Cycling Infrastructure Plan) for infrastructure improvements by 2026 to help deliver the required modal shift.

1. London Rd / Hadleigh Rd

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<sup>3</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTPF%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

<sup>4</sup> Consultation Statement for the Ipswich Local Plan Review 2018-2036 Regulation 22(c) Statement (A11)

<sup>5</sup> SCC's Draft Local Cycling & Walking Infrastructure Plan (dated 15/03/2019) was presented at Suffolk Cabinet 20/January 2020). We note the comment in the Infrastructure Delivery Plan (I16) that *"Suffolk County Council are leading meeting cycle and pedestrian infrastructure needs through the LCWIP which they are working to try to have ready for adoption in September 2020 to assist the Active Travel funding bid"*.

2. Wherstead Rd
3. Henley Rd / Westerfield Rd
4. Birkfield Drive
5. Hawthorn Drive
6. Inner orbital
7. Gipping River Path
8. Woodbridge Rd / Spring Rd
9. Nacton Rd / Landseer Rd

We note the comment that in the Infrastructure Delivery Plan (I16) that *“The greatest infrastructure needs [for cycle and pedestrian infrastructure] will be required for the two sustainable urban extensions of Ipswich Garden Suburb and the allocation north of Humber Doucy Lane where the needs for sustainable transport links will be the greatest”*. This infrastructure is critical to the sustainable delivery of substantial numbers of new homes and must be included in the Infrastructure Tables, along with delivery dates for it to be sound.

The Infrastructure Delivery Plan (I6) is incorrect in stating that “No major utilities infrastructure is identified” as it fails to identify that Anglian Water have the following three projects committed in their Water Recycling Long-Term Plan (September 2018)<sup>6</sup> – see pages 105 and 106.

- Increased Water Recycling Centre Process Capacity - £12.3m cost – Scheduled for completion by 2032;
- Combined Sewage Overflow improvements - £11.96m cost – Scheduled for completion by 2027; and
- Increased Drainage Capacity through surface water management and upsizing (Defined Contingent Scheme) - £15.496m cost – Scheduled for completion by 2027.

This major water recycling infrastructure is clearly required for the delivery of the Plan and should be included in the Infrastructure Table 8A for it to be sound.

Table 8A references *“AW water supply and foul water connections – may include network upgrades”*. We believe that specific reference to the pumping stations and offline storage required for the IGS should be included here or in Table 8B for the Plan to be sound.

For these reasons we do not believe IBC has provided sufficient evidence that the Plan will deliver the right infrastructure and services required to support sustainable growth at the right time, especially that required to deliver high levels of modal shift, for it to be sound. The inclusion of such detail could help overcome this issue.

### **31. Is the list of strategic and neighbourhood infrastructure requirements for the IGS in Table 8B complete?**

Representations 26493, 26496, 26507, 26509, 26534, 26506, 26522, 26494, 26523, 26532, 26533, 26536, 26495, 26538

No.

Given the importance of the “Access and Transport Projects” these should include the required implementation dates in Table 8B for the Plan to be sound (as for the infrastructure projects identified in Table 8A). The “Off-site junction improvements in surrounding road network” should also be identified by specific junctions. Timescales are required for Table 8B to demonstrate the traffic/air quality modelling assumptions of 15% modal shift and these junction improvements to be in place by 2026, and the Plan itself, are sound. Currently there is a major disconnect between the delivery dates assumed in the modelling and those specified in Planning applications, which is clearly unsound.

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, in the following

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<sup>6</sup> <https://www.anglianwater.co.uk/siteassets/household/in-the-community/water-recycling-long-term-plan.pdf>

table, when road infrastructure is actually planned to be delivered. These dates are mainly later than those assumed in the modelling, which is therefore unsound.

| Trigger Point      | Road infrastructure improvements etc                | Indicative date from I6 build schedule |
|--------------------|---|--|
| <b>Henley Gate</b> |   |  |
| 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                                |
| <b>Fonnereau</b>   |   |  |
| 399 homes          | Westerfield Rd/Valley Rd junction                   | 2028                                   |
| 499 homes          | Tuddenham Rd/Valley Rd junction                     | 2030                                   |

IBC needs to confirm that the £9.8m from the Housing Infrastructure Fund will still be available for the road bridge when it is scheduled to be constructed in 2028/29. Similarly, other modal shift projects/infrastructure funded by IGS Developers, through planning Conditions, will not have been delivered by 2026 e.g. the Smarter Choices Programme for homes between Norwich Road and Henley Road, which is required to commence with the 500<sup>th</sup> home (forecast in I6 as 2027/28); clearly too late to deliver the 15% modal shift required by 2026. The third trigger point for off-site sustainable travel measures for both Henley Gate and Fonnereau is also post 2026 so these will not be delivered in time. The Plan can be made sound by either

- a) re-running the traffic and air quality modelling with agreed infrastructure/modal shift delivery dates (rather than assuming they will be delivered in 2026) to demonstrate soundness, or
- b) by IBC securing funding for these road infrastructure and modal shift projects for them to be fully operational by 2026.

Policy CS10 references the “Ipswich Garden Suburb Infrastructure Delivery Plan” but this does not appear to have been updated since 2017 and is therefore obsolete. Given the progress outlined in I6, we would now expect to see some form of updated Infrastructure Delivery Plan. This needs to be provided and examined before the Plan can be found to be sound to ensure it is consistent with the traffic and air quality modelling assumptions.

“Any strategic improvements to sewerage system” is too much of a catch-all and should identify the specific key requirements for the Plan to be sound. For example, from the Henley Gate Phase1 planning application we know that two pumping stations will be required and, from previous discussions, that some form of foulwater offline storage capacity will be required either on the IGS site and/or added to the existing network in more than one location. Further details of the type of foulwater infrastructure that will be required, by when and where is required to be included in the Infrastructure Tables to ensure that it can be delivered in a timely to manner for the Plan to be sound. We would expect this to be available in the IGS Infrastructure Delivery Plan for it to be robust. We note that the submitted Infrastructure Delivery Plan (I6) is misleading in stating that “No major utilities infrastructure is identified” as we know that it will be required but just not the specific details of when/where etc.