

Matter 8 – Development Management Policies

Issue: Whether the development management policies are justified, positively prepared, effective and consistent with national policy?

Representations 26497, 26525, 26531, 26530, 26538

Transport and Access

227. Is Policy DM21 effective, justified and consistent with national policy in respect of transport and access in new developments?

No. Paragraph b. fails to ensure compliance with legally binding air quality targets and requires amendment for the Plan to be sound. It currently reads “*[new development shall] 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*”.

We suggest this is amended to “*[new development shall] not result in a significant detrimental impact on air quality or contribute to non-compliance with UK Air Quality Targets and shall include appropriate mitigation measures as required through policy DM3*”.

In this respect we note that the traffic and air quality modelling, underpinning the Plan, fails to assess the impacts of traffic on air quality before 2026 when average Ipswich vehicle emissions will be far higher than in later years.

Air Quality

231. Is Policy DM3 consistent with national policy in respect of the impact of new development on air quality?

No. The current focus of Policy DM3 is “*to mitigate the impact of development on air quality and to ensure exposure to poor air quality is reduced in the Borough*”. But this fails to ensure compliance with legally-binding air quality targets and is therefore unsound. For the Plan to be sound the focus of Policy DM3 should be “*to mitigate the impact of development on air quality and to ensure compliance with legally binding air quality targets across the Borough*”. We suggest that a date for IBC to achieve compliance is included.

Infill and Backland Residential Developments

248. Should Policy DM17 include reference to the unacceptable loss of semi-natural habitat?

Yes. This would ensure Policy DM17 is sound with respect to Policy CS7 and CS16.

249. Does Policy DM17 unduly constrain the ability of the Borough to secure sufficient windfall housing to ensure the delivery of the projected housing land supply?

No. We believe that IBC will be able to secure sufficient windfall housing and has established a 5-year land supply.

This Policy is required to deliver Policy CS7 and Policy CS16. It is wholly consistent with Ipswich Urban Characterisation Supplementary Planning Documents (G9-G16) and Ipswich Conservation Area Character Appraisals and Management Plans (G22-G36).