

NFPG Statement on Outstanding Sustainability Assessment (SA) Issues

Poor air quality (AQ) is considered the largest environmental risk to public health in the UK¹ (Document E1 SCC Local Cycling & Walking Infrastructure Plan (2020) V9 (page 8)). Page 17 of the Health Impact Assessment (HIA) recognises that “Pollution and poor air quality levels are found across Ipswich” yet the SA (and indeed the HIA) fails to recommend that the Plan needs to incorporate measures to ensure AQ will be improved sufficiently in the early years of the plan (before 2026) to meet legal UK limits and prevent damaging health impacts. To be legally compliant the SA should recommend the Plan includes a target date to comply with legally binding UK AQ targets.

The SA is not currently legally compliant as it fails to fully consider AQ-related issues. It fails to identify that:

1. There has been no AQ assessment before 2026, when emissions from traffic are likely to be highest.
2. The traffic modelling and the AQ assessment exclude the impacts of construction traffic (and construction itself) required to deliver the Plan. This is of particular concern for routes to/from the IGS during its long build-out, such as Norwich Rd and the A1214.
3. There has been no assessment of the major construction impacts on AQ and traffic of the planned improvements to the Anglian Water Foulwater network (for transportation to Cliff Quay) required to meet planned growth and to connect the IGS to the foulwater system, including large off-line storage systems.
4. New and improved infrastructure compliant with DfT Cycling Infrastructure Design standards (as evidenced by SCC Document E1 (page 11)) is required to deliver modal shift in and around the existing AQMAs; but this has not been specified in Table 8A.
5. There has been no assessment of the impacts of higher emissions from increased rail freight traffic to/from Sizewell and Felixstowe docks, which are diesel-powered. Likewise, from the growth of the Port of Ipswich.

The combined impact of these omissions on AQ (and the associated health impacts) is likely to be material. Therefore, the SA has not adequately influenced the Plan, as it fails to identify and address the issues raised above. The SA needs to be updated so that it specifically addresses these concerns and recommends measures to mitigate them where required. We also believe that the HIA also needs to specifically answer these concerns for it to be legally compliant and suggest that the Planning Inspectors might wish to consider this concern further.

We remain concerned that the SA has not identified the heavy reliance of the Plan on achieving 15% modal shift by 2026 and that it fails to recommend this be included as a target, supported by appropriate monitoring requirements. IBC’s response to the SA recommendations on cycle and pedestrian routes etc is insufficient and the Plan needs to commit to the provision of sustainable infrastructure by complying with DfT Cycling Infrastructure Design funding standards as proposed by SCC (Document E1 (page 11)) on key routes by 2026.

The SA has not considered the potential for land allocated to retail (including new Westgate and Mint Quarter retail sites) and car-parking to provide more town-centre homes, rather than build on green field land on Humber Doucy Lane. This should have been assessed as Spatial Option 3. The SCC Main Modifications MM81 and MM84 clearly substantiate this in respect of car parking. The high levels of modal shift and increased home working that SCC expects to achieve will reduce the need for public and private car parking in central Ipswich and could free up existing private-sector car parking (such as by the AXA and Willis Faber buildings) to public users. We also suspect that Covid-19 will reduce demand for permanent office space, which could free-up further land from the commercial sector for homes and green space. We support the flexibility offered in Policies DM 27 and 31 but due to Covid-19 believe this needs to go further; in our opinion, retail space and car parking requirement in the town centre is over-estimated. The Retail Position Update Statement (I6) already identifies an excess of 650sq m net comparison floorspace (page 31) in August 2019. Since then the decline of the High Street has quickened. Covid-19 has unfortunately accelerated this further. The NFPG is desperate to see a vibrant, viable Retail offering in Ipswich town centre, which might best be achieved by a more concentrated, central retail offering, rather than the current dispersed and disjointed offering with many voids (even before Covid-19). We also believe that better use of modern, well-designed multi-story car parks would free up land currently taken by the proliferation of inferior temporary car parks making Ipswich more attractive to shoppers. These alternatives should at least be assessed as potential spatial options by the SA for it to be legally compliant and to ensure the Plan is sound.

¹ Public Health England, Guidance: Health matters: air pollution, November 2018 [Health matters: air pollution - GOV.UK \(www.gov.uk\)](https://www.gov.uk/health-matters-air-pollution)