

Ipswich Local Plan Review – Policy CS10 – Ipswich Garden Suburb – Actions/Tasks

Main Modification to Local Plan Review Policies Map Key (A3) – Ipswich Garden Suburb change from Location for Secondary School to Broad Location for Secondary School

As set out in IBC's Matter 6 Statement (Paragraph 86), the reason that a specific location was identified for the Secondary School location was to provide certainty on the secondary school provision on the IGS and the land required in line with Policy CS10. The location identified on the Local Plan Policies Map helped to maintain the separation to Westerfield Village and was reasonably accessible to the whole of the IGS.

Following discussions at the Matter 6 Hearing Session and having regard to the Suffolk County Council Matter 6 Statement, IBC have considered changing the wording within the key for the Ipswich Garden Suburb on the Policies Map (A3) so as to indicate a 'broad location' for the Secondary School, rather than a specific location.

IBC recognise that there has been a change since the adoption of Policy CS10 with the determination of two outline planning applications on the IGS which has resulted in an Option Agreement being entered into between Suffolk County Council and Mersea Homes (landowners of Phase N3a). This is referenced in Suffolk County Council's Matter 6 Statement at paragraph 86.

As discussed at the Hearing Session, IBC are not a party to this Option Agreement. The land subject to the Option Agreement is not that identified for the Secondary School on the Policies Map and there is a potential deficiency in the size of the land parcel comprised in the Option Agreement. The Option Agreement secures land for both the Primary and Secondary School and is less than the 11ha required for the two schools, as set out in Policy CS10. IBC did highlight these concerns to SCC when discussions were being undertaken on the Option Agreement and that the completion of this Option could not prejudice the decision on any application that may be submitted to IBC for the Secondary School.

Having considered the Inspector's request to review this matter, IBC draw on the fact that the purpose of Policy CS10, Table 8b and the Policies Map is to secure the provision of a Secondary School on the IGS and specifically on the Red House Neighbourhood. When read alongside Policy CS10 and Table 8b, which set out the land use and size for a Secondary School to be provided on the IGS and specifically as an infrastructure item in the Red House Neighbourhood, IBC considers that the introduction of the word "broad" is sufficient to secure its provision through any application submission.

For this reason, IBC's position is to propose a main modification to the Policies Map to include "broad" prior to the words "Location for Secondary School".

Council and Phase 2 Planning to revisit the mathematical possibility of achieving 31% affordable housing on the IGS allocation

Following the Inspector's request, IBC have revisited their position stated at the Hearing for Matter 6 on whether 31% affordable housing can mathematically be achieved on the IGS allocation.

As set out at Paragraph 8.137 of the supporting text to Policy CS10, 31% of affordable housing would equate to 1,085 dwellings over the IGS allocation. This paragraph sets out that to achieve 31% across the IGS, each phase (as identified by Map IGS1), could provide over the 31% but with a cap of 35%. The phases are defined by the IGS neighbourhood in which they are situated and the land ownership, but do not necessarily represent the order in which the IGS would be developed. Towards the end of this paragraph, the text explains that certain components of each Phase may deliver more than the 35% to achieve the overall cap of 35% within that Phase and this would then go towards the overall target across the IGS allocation of 31%.

As explained during the course of the Hearings, the IGS provides an important role in delivering affordable housing within the administrative boundary of Ipswich.

The relevant part of Policy CS10 on the level of affordable housing sought is as follows:

Overall, the Council will seek 31% affordable housing at Ipswich Garden Suburb. For each individual application, the level of affordable housing should be the maximum compatible with achieving the overall target and achieving viability, as demonstrated by an up to date viability assessment which has been subject to independent review. The re-testing of the viability will occur pre-implementation of individual applications within each neighbourhood. Each phase of development will be subject to a cap of 35% affordable housing. The Council will seek a mix of affordable dwelling types, sizes and tenures in accordance with policies CS8 and CS12.

IBC's position is that the Whole Plan Viability Report has found that 31% affordable housing can be achieved on the IGS allocation. Whilst it is accepted that two outline planning permissions have been granted with lower levels of affordable housing this itself does not alter the conclusions of the WPVA which IBC contends are sound.

As has been explained by IBC's viability expert (Aspinall Verdi), different inputs can significantly change the surplus which would in turn provide for a higher level of affordable housing being achieved. This was explained by Aspinall Verdi at the Hearing.

Examples of some of the differences are set out below. The differences shown, help to highlight the distorting effect of extrapolating these differences from a single phase and then applying across the whole development. As explained by Aspinall Verdi, they have assessed the development as a whole, which in turn does not result in these distortions highlighted.

- **Density** – Aspinall Verdi have used 35 dph as per the SPD, whereas the Land South of Railway is bringing brought forward at a lower density of 32 dph – a difference of 8%. The sensitivity tables in the Aspinall Verdi WPV report (extract below) shows a reduction in density from 35 to 32 dph would reduce overall viability by £4.443 million (i.e. the difference between £8.799m and £4.356m)

Balance (RLV - TLV)	8,799,322	AH - % on site 31%						
		15%	20%	25%	31%	35%	40%	50%
Density (dph)	25	16,745,831	8,339,062	(68,814)	(10,158,486)	(16,884,934)	(25,293,994)	(42,114,726)
	27	21,660,819	13,254,050	4,846,173	(5,243,499)	(11,969,947)	(20,379,007)	(37,199,739)
	30	27,804,553	19,397,784	10,989,907	900,235	(5,826,212)	(14,235,273)	(31,056,005)
35	32	31,260,404	22,853,635	14,445,758	4,356,086	(2,370,362)	(10,779,422)	(27,600,154)
	35	35,703,640	27,296,871	18,888,994	8,799,322	2,072,874	(6,336,186)	(23,156,918)
	37	38,265,506	29,858,737	21,450,860	11,361,188	4,634,740	(3,774,320)	(20,595,052)
	40	41,627,955	33,221,186	24,813,309	14,723,638	7,997,190	(411,871)	(17,232,603)
	42	43,602,727	35,195,958	26,788,081	16,698,409	9,971,961	1,562,901	(15,257,831)
	45	46,235,756	37,828,987	29,421,110	19,331,438	12,604,990	4,195,930	(12,624,802)
	47	47,804,369	39,397,600	30,989,723	20,900,051	14,173,603	5,764,543	(11,056,189)
	50	49,921,996	41,515,227	33,107,351	23,017,679	16,291,231	7,882,171	(8,938,561)

- **Gross to net developable area** – the Henley Gate development has a residential land take of 41% with the balance of the site for open space etc. at 59%. Aspinall Verdi have used a residential land take of 61% based on the IGS (see Paragraph 5.98 of the Aspinall Verdi WPV report). Effectively, for the Henley Gate phase they are having to acquire a larger gross site area than that assumed in the WPV testing. The impact of having to acquire more land negatively impacts viability. As stated in the Paragraph 5.97 of the Aspinall Verdi WPV report the land value used is based on £117,000 per gross acre. The table below illustrates the impact on how the two different gross to net developable areas has on viability if they were applied across the whole development. In essence, using a much lower gross to net developable area in the Aspinall Verdi WPV based on the Henley Gate development and not the SPD would in essence add another £23 million of costs.

	Residential land take as percentage of overall sites area 61% - as per AspinallVerdi WPV applied to all dwellings	Residential land take as percentage of overall sites area - 41% Henley Gate application applied to all dwellings	Difference
Gross land value per acre	£117,000	£117,000	
Gross land value per net acre	£191,803	£285,366	
Residential site area 100ha expressed as acres	247.1	247.1	
Totals	£47,394,590	£70,513,902	£23,119,312

IBC would also wish to highlight that each S106 includes an obligation that should the developer fail to construct and make available 30 residential units (including associated infrastructure) within two years of receiving detailed planning permission, the developer shall submit an open book assessment which shall assess the viability for the whole development granted under the application.

As the question is whether it is mathematically possible to achieve 31% over the IGS allocation it cannot be dismissed that new planning applications could be submitted on the IGS which provide higher levels of affordable housing.

On this basis alone IBC would contend that it remains mathematically viable to achieve 31% affordable housing on the IGS allocation.

Following the request of the Inspector IBC and Phase2Planning have discussed the different position each party stated at the hearing on what could mathematically be achieved should the two granted outline planning permissions be implemented. This is done on a without prejudice basis to the comments set out above.

IBC's position is that the obligations within the Section 106 Agreements accompanying Outline Planning Permissions 14/00638/OUT and 16/00608/OUT still allow mathematically for 31% across the IGS allocation.

IBC Calculation:

Site	AH provision	AH units
Henley Gate Baseline AH Level	5% of 1100 total	55
Henley Gate remainder after 2 viability review.	35% of 1100 total (excluding baseline of 55 units)	330
Henley Gate Total AH	35% of 1100	385
Fonnereau Baseline AH Level	4% of 815	33
Fonnereau remainder after 2 viability reviews.	35% of 815 total (excluding baseline of 33 units)	252
Fonnereau Total AH	35% of 815 total	285
IGS remainder 35% per phase: N1b; N2b, N3a, N3b (Reference to Map IGS1 in Local Plan)	35% of 1585	555
Total AH Units		1225
Total %	1225/3500	35%

Appendix 1 attached to this paper provides commentary on the different calculations achieved.

From the justifications set out above and the justification within Appendix 1 IBC stand by the position at the Hearing that 31% affordable housing across the IGS can mathematically be achieved. **Main Modification to Policy CS10 on the wording related to the Ipswich Garden Suburb SPD**

IBC have considered the Inspector's request to consider the wording within Policy CS10 that relates to the purpose of the Ipswich Garden Suburb SPD. The relevant part of the policy is as follows:

An Ipswich Garden Suburb supplementary planning document (SPD) has been adopted, which will:

- a. guide the development of the whole Ipswich Garden Suburb area;**
- b. amplify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration;**
- c. identify the detailed location of a district and two local centres and other supporting infrastructure; and**
- d. provide guidance on the sequencing of housing and infrastructure delivery required for the development.**

At the Hearing Phase2Planning raised their concerns on this wording and referred to their Matter 6 Statement with alternative wording. IBC are satisfied that the wording above, with the exception of point C, identifies that the Ipswich Garden Suburb SPD only expands on those policy requirements detailing the environmental, social, design and economic objectives relevant to the attainment of the development and use of land. It is also noted that this is an adopted Policy.

The Ipswich Garden Suburb Supplementary Planning Document is a detailed document intended to guide this important strategic housing allocation. The text above clearly identifies its remit, in line with the relevant regulations, for guiding applications coming forward.

IBC considers that the generalised wording proposed by Phase2Planning does not improve the clarity of the policy and is an attempt to water down the consideration of the SPD when assessing any planning application on the IGS.

Having regard to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012, IBC have considered the wording at point (c.) which was specifically raised within the Hearing and propose a Main Modification to Policy CS10 to replace "identify" with "guide" so that it would read:

- c. ~~identify~~ guide the detailed location of a district and two local centres and other supporting infrastructure; and**

IBC's position is that this change to the wording is sufficient to address the point raised.

Phase2Planning have also proposed new wording for the following part of Policy CS10, as follows:

"Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD."

The purpose of the SPD is to guide how this strategic housing allocation can be brought forward comprehensively and to ensure that any individual development does not jeopardise this. The Ipswich Garden Suburb, through Policy CS10, Table 8b, the Policies Map, the IGS SPD and IGS IDP, is a well-planned, comprehensive sustainable urban extension to Ipswich with housing supported by appropriate infrastructure. In the absence of an overarching planning permission, it is key that individual sites on the IGS do not prejudice other development phases. IBC's clear vision on how this strategic site will work collectively is set out in the IGS SPD and this part of Policy CS10 makes that clear for any application which is to be submitted to the Local Planning Authority.

The wording that Phase2Planning have proposed in their Matter 6 Statement removes the need for development to avoid prejudice to other development on the IGS and undermines the Policy intention to ensure a comprehensive, sustainable urban extension to Ipswich. However, it is accepted that the use of the words "in accordance" could be more amended to better reflect the role of the IGS SPD.

IBC's position is to propose a Main Modification to Policy CS10 to read:

Development proposals will be required to demonstrate ~~that they are in accordance with the SPD~~ how they have had regard to the principles, objectives and vision of the adopted SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD.

Main Modification to Policy CS10 on the wording related to the Viability

At the request of the Inspector, IBC have revisited the wording on viability and have had regard to Phase2Planning's proposed text within their Matter 6 Statement (Paragraph 83). As stated at the Hearing, this review of the text is on a without prejudice basis to the Council's position that 31% affordable housing is the appropriate level to be sought on the IGS.

IBC do not consider that the proposed revisions to the Policy are acceptable or that they would provide the optimum affordable housing levels that can be achieved on the IGS. The reasons for this are as follows:

The need for affordable housing in Ipswich is evidenced by the Strategic Housing Market Assessment (CDL D16). Policy CS10 has been worded to allow the maximum affordable housing level that can be achieved (as demonstrated by a viability appraisal) to be secured. This flexibility in approach is evidenced by the determination of the two outline planning applications, which have secured a baseline of affordable housing together with further reviews which seek to increase the affordable housing level over the lifetime of the delivery of the development.

Therefore, IBC do not consider that it is necessary to include a minimum amount of affordable housing in Policy CS10, as suggested by Phase2Planning, and certainly not at 5% which is significantly below the level indicated as deliverable through the Council's Whole Plan Viability Assessment (CDL D42). IBC's position is that each application will be judged on its merits at the time that it is received. The starting point for the determination should be aiming to meet

the target which IBC consider to be realistic in light of the Whole Plan Viability Appraisal. Where viability assessments show that a policy compliant level of affordable housing cannot viable be delivered, Policy CS10 contains sufficient flexibility to allow such a scheme to come forward, with appropriate review mechanisms in place.

Phase2Planning have suggested the inclusion of a maximum target of 21% affordable housing. Again the Council does not consider that this revision in the wording improves how Policy CS10 would be used to secure affordable housing through any planning application submitted. Furthermore, IBC does not, for the reasons set up above in this paper, consider that 21% is acceptable or justified, as it has not been demonstrated to be the maximum that can be achieved on the IGS.

The Council's position on this part of Policy CS10 is that it remains as proposed:

Overall, the Council will seek 31% affordable housing at Ipswich Garden Suburb. For each individual application, the level of affordable housing should be the maximum compatible with achieving the overall target and achieving viability, as demonstrated by an up to date viability assessment which has been subject to independent review.

The second part of the paragraph in Policy CS10 reads:

The re-testing of the viability will occur pre-implementation of individual applications within each neighbourhood. Each phase of development will be subject to a cap of 35% affordable housing. The Council will seek a mix of affordable dwelling types, sizes and tenures in accordance with policies CS8 and CS12.

IBC have considered Phase2Planning's proposed wording to amend this part of Policy CS10 and cannot agree with the proposed changes. The existing wording above reflects the work that has been undertaken on the level of affordable housing that can be achieved over the IGS. This has been based on a 'phase' basis which has been clearly defined by MapIGS1 which shows each phase as being related to a Neighbourhood (Henley Gate/Fonnereau/Red House) and then landownership. It is reasonably expected, as has been shown with the two determined outline planning permission, that planning applications for the principle of the development will be submitted under those phases.

The wording suggested by Phase2Planning for a development of a "sufficient size" to be implemented in more than one viability phase is unclear and ambiguous. Furthermore this would open up the option for developers to seek to submit smaller applications that could be argued would not allow for a further viability review. The proposed wording does not define what is determined as a "viability phase". As with the determined applications, the appropriate trigger points were subject to negotiation as part of the overall package of acceptable S106 Obligations and Affordable Housing levels and were not based on the phases of delivery of the development.

IBC's position is that the wording within Policy CS10 has been successful in granting two outline planning permissions with a baseline of affordable housing and viability reviews to seek to improve the level of affordable housing.

Phase2Planning has also suggested the wording "*Each viability phase within the relevant planning permission will be subject to a maximum cap of 35% affordable housing*". This amendment to change from phase to planning permission is not deemed necessary and as

detailed above would not be in line with the work undertaken on securing the 31% affordable housing level for the IGS.

IBC's position is that the wording suggested by Phase2Planning is not appropriate for the IGS and that the wording for this part of Policy CS10 should remain unchanged.

Ipswich Local Plan Review – Policy CS10 – Ipswich Garden Suburb - Actions/ Tasks

Main Modification to Policy CS10 to reduce dwellings numbers to 3,295 units within the plan period

IBC has considered the Inspector's comments on the wording of Policy CS10 which as submitted reads "residential development of approximately 3,500 dwellings" to whether this should be amended to reflect the 3,295 dwellings anticipated to come forward in the plan period.

IBC do not consider that the wording of this part of Policy CS10 needs to change and provides an appropriate level of housing to be expected to come forward on the Ipswich Garden Suburb. The use of the word approximately within Policy CS10 provides sufficient allowance that housing completions on the IGS will be around this number, it is reasonable to view 3,295 dwellings within the range of approximately.

IBC's Matter 6 Statement (paragraph 78), the evidence provided by IBC at the Hearing on the 26th November (Session 1) and the further housing delivery paper supports the position that the IGS can deliver housing at pace. As was heard at the Hearings and set out within the evidence the IGS could have several developers on the site at any one time which could allow for a higher rate of delivery than that projected. Furthermore, as a long-term project market conditions can change to see an increase in housing delivery which in turn could be supported by government funding. It has already been demonstrated that IBC have good working relationships with Homes England.

IBC have carefully considered the strategic development of the IGS to ensure its full potential for delivering housing with supporting infrastructure in Ipswich and the wording of Policy CS10 provides the strong policy basis for applications to be assessed against, as demonstrated by the two outline planning permissions granted (for 1915 dwellings). IBC would wish to see the full potential of housing on the IGS developed as soon as could viably be achieved. There is no planning reason why these houses could not be provided before the end of the plan period. IBC consider reducing the numbers set out within Policy CS10 could in fact have a negative effect on the housing delivery should applications be determined against a revised housing number for the site where developers and/or the local community may consider the reduction in housing numbers is because more infrastructure is needed to support the remaining houses, which is not the case.

Council to consider whether the wording in Table 8B makes it clear that an off-site library contribution may be required

Policy CS10 and Table 8b looks for provision of a library facility as part of the strategic community facilities on the IGS. During the consideration of the now determined applications Suffolk County Council's position changed on what library services would be sought, based on what was reasonable for the development and the type and level of service the Council could

financially afford to support. Originally, SCC also sought a contribution towards off-site provision (County Hall Library), however a bespoke position was taken for IGS.

For the IGS, as set out in the committee reports, presented to the Planning and Development Committee on the 4th April 2018, a space is to be provided within the community building (that IBC will be responsible for building) in the district centre on the Fonnereau Neighbourhood. The community library service for the IGS would be based on a mixture of deposit/collection of lending material through a self-service public terminal and a fortnightly outreach visit, branded Suffolk Libraries Local. The outreach visit will deliver activities, events and learning sessions as well as the usual opportunity to borrow from a supplementary of books and audio-visual material. The cost apportioned to providing this service was at the time of the Committee Report £25,808 for the IGS as a whole which would be pro-rated across applications.

The financial contributions and IBC securing library space within the community building are secured through the S106 Agreements.

This bespoke position for library provision on IGS is based on the ability to secure space on site which would not be feasible on other developments. IGS with its own policy including Table 8b, SPD and IDP has identified what infrastructure would make it acceptable in planning terms. This has included the provision of on-site facilities. It is IBC's position that the IGS application would be judged on their own merits and that Table 8b does not need to be altered.

Note on the impact of delayed junction improvements on highway network



ISPA Local Plan Modelling : Model Run 7 Sensitivity Test

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1. INTRODUCTION

1.1.1. This Technical Note (TN) has been produced as an addendum to document references “D35 – ISPA Local Plan Modelling Methodology Report” and “D36 - Local Plan Modelling for ISPA Methodology Report”, which relate to strategic traffic modelling undertaken to support the examination of the Ipswich Local Plan. This TN details a sensitivity test which has been undertaken to provide further evidence in response to issues raised in hearing position statements from the Northern Fringe Protection Group (NFPG) and Save Our County Spaces (SOCS), in particular responses to the following question from PINS related to the Ipswich Garden Suburb;

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

1.1.2. In the position statements, both NFPG and SOCS have raised the following concern in response to the above question:

“Currently there is a major disconnect between the delivery dates assumed in the modelling and those specified in Planning applications, which is clearly unsound.”

1.1.3. This TN seeks to demonstrate the conclusions from the traffic modelling are not significantly affected by changes in when highway mitigation is delivered for the IGS development. The modelling in this TN is based on a sensitivity test of the following scenario which is considered a worst case:

- 2026 AM peak hour (0800-0900) and PM peak hour (1700-1800) **without demand mitigation**

1.1.4. The mitigation detailed below was previously assumed to be in place in the 2026 forecast year. These junctions were reverted to be the same as the 2016 base year for the purposes of the sensitivity test

- Westerfield Road / A1214 Valley Road junction
- Tuddenham Road / A1214 Valley Road junction

1.1.5. Other mitigation associated with IGS such as the road bridge over the railway line, Henley Road / A1214 Valley Road and Dale Hall Road / A1214 Valley Road has not previously been considered in the strategic highway model given they do not have an impact on highway traffic in the AM and PM peak hour.

2. IPSWICH GARDEN SUBURB ASSUMPTIONS

2.1.1. It is important to note the assumptions around the phasing of the IGS development differ between the strategic modelling and the latest delivery timetable provided by IBC in their I6 topic paper. Table 1 provides a comparison of what has been included in the strategic modelling compared to the topic paper, this demonstrates a significant difference of an additional 452 dwellings has been modelled. Therefore in terms of the trip generation to/from the IGS development, the 2026 modelling demonstrates a robust and worst-case scenario.

Table 1 – Comparison of assumptions on buildout for Ipswich Garden Suburb for 2026 forecast year

Ipswich Garden Suburb parcel	2026 dwellings – ISPA Local Plan modelling	2026 dwellings – IGS delivery from 1st April 2020 (I6 Topic Paper)
IGS Phase 1a - Fonnereau	364	210
IGS Phase 2a – Henley Gate	526	343
IGS Phase 3a & 3b – Red House Farm	241	126
IGS Phase 1b – Ipswich School	0	0
Total	1131	679

3. MODEL RESULTS

3.1. OVERALL JUNCTION VOLUME / CAPACITY

- 3.1.1. In keeping with how congested locations are reported in the D35 and D36 documents, Volume / Capacity ratio (V/C) is presented, firstly in terms of the overall figures for junctions on the A1214 Valley Road which have had the highway mitigation removed.
- 3.1.2. Table 2 shows the V/C values at the A1214 Valley Road junctions increase without the mitigation in place to a level where the junction is considered to be congested. However, overall the junctions are still considered to be operating within capacity.

Table 2 – Overall junction Volume / Capacity changes for selected A1214 junctions

Junction	AM 2026 (V/C)	AM 2026 Sensitivity Test (V/C)	PM 2026 (V/C)	PM 2026 Sensitivity Test (V/C)
A1214 Valley Road / Westerfield Road	76%	92%	69%	88%
A1214 Valley Road / Tuddenham Road	77%	93%	74%	90%

3.2. LINKED BASED VOLUME / CAPACITY

3.2.1. Table 3 details the link based V/C for the A1214 Valley Road / Westerfield Road junction between the 2026 scenarios. This demonstrates the eastern A1214 Valley Road approach becomes over capacity without the highway mitigation in place.

Table 3 – Link based Volume / Capacity changes for approaches to A1214 Valley Road / Westerfield Road junction

Junction	AM 2026 (V/C)	AM 2026 Sensitivity Test (V/C)	PM 2026 (V/C)	PM 2026 Sensitivity Test (V/C)
Westerfield Road North	78%	97%	41%	57%
A1214 Valley Road East	95%	104%	88%	102%
Westerfield Road South	52%	68%	54%	81%
A1214 Valley Road West	63%	80%	66%	92%

3.2.2. Table 4 details the link based V/C for the A1214 Valley Road / Tuddenham Road junction for the 2026 scenarios. This analysis shows the A1214 Colchester Road eastern arm becomes over capacity in the AM peak, whilst the southern Tuddenham Road approach in the PM peak become over capacity without the highway mitigation in place.

Table 4 – Link based Volume / Capacity changes for approaches to A1214 / Tuddenham Road junction

Junction	AM 2026 (V/C)	AM 2026 Sensitivity Test (V/C)	PM 2026 (V/C)	PM 2026 Sensitivity Test (V/C)
Tuddenham Road North	88%	95%	57%	65%
A1214 Colchester Road East	80%	100%	79%	96%
Tuddenham Road South	60%	70%	90%	100%
A1214 Valley Road West	76%	97%	72%	96%

3.2.3. In summary, whilst the increased congestion including links at/over capacity on the A1214 corridor is not ideal, the mitigation related to the IGS development is considered likely to be delivered in 2027 or 2028, therefore alleviating the congestion issues at these locations at the earliest opportunity during the Local Plan period.

3.3. AIR QUALITY

3.3.1. In relation to changes in traffic flows on the A1214 corridor, the changes in peak hour flows are not considered to materially change the conclusions which have been derived from the Air Quality assessment detailed in documents D33 and I9.

4. CONCLUSION

- 4.1.1. The sensitivity test within this note has sought to demonstrate the impact of removing the IGS improvements at the existing Westerfield Road and Tuddenham Road roundabouts on the A1214.
- 4.1.2. The sensitivity test is considered a robust test of likely traffic congestion in 2026 given it has been undertaken without the demand adjustment mitigation, and also includes a significantly higher quantum of development at the IGS development compared to the latest delivery timetable.
- 4.1.3. Congestion issues are shown to increase on the A1214 corridor without the highway mitigation in place at the two specified junctions, with specific arms becoming at or over capacity. However, overall these junctions continue to operate within capacity without the mitigation in place.

Main Modification to add Anglian Water schemes into Table 8B

IBC was asked to consider whether a main modification to Table 8B is necessary to specify the foul water infrastructure that is needed to support the IGS.

Table 8b refers to the need for application on the IGS to provide strategic foul infrastructure. The exact details of these are not under the control of IBC but at this time under the control of Anglian Water.

As was explained during the Hearing, the approach IBC has taken for the approved outline planning applications is to impose planning conditions to require a site wide foul water drainage strategy. This is based on the consultation advice of Anglian Water to the applications.

The site-specific approach has and will identify what is required for each development. For example the site wide foul drainage strategy for the Henley Gate development has identified the need for the provision of two pumping stations and offline foulwater storage.

Since the Hearing session IBC has consulted Anglian Water on the matter. Anglian Water have stated that they do not consider it is necessary to repeat the details (the two pumping stations and offline foul water storage) of the foul drainage strategy in Table 8B.

IBC considers that the wording of Table 8b as submitted provides sufficient clarity that developments at IGS will be expected to provide strategic improvements to the sewerage system. Not all of the land at IGS has planning permission at this time and it would be premature to attempt to specify the precise details of what the foul water infrastructure may be required when the exact infrastructure cannot be known at this time. The exact details can be secured through planning conditions and these details will be within the public domain.

In addition, any planning application would need to be determined in accordance with all local plan policies and not just Policy CS10. Policy DM4 (Development and Flood Risk) requires:

C. that adequate sewage treatment capacity and foul drainage already exists or can be provided in time to serve the development

As such, Ipswich Borough Council do not consider that a main modification is not necessary.