

Appendix 2

Low Emissions Strategy Supplementary Planning Document (SPD) Consultation Statement for Consultation draft SPD, August 2020

Introduction

Please note that the Low Emissions Strategy SPD now incorporates the Parking Guidance for the IP-One Area SPD. The Council decided through the Ipswich Local Development Scheme brought into effect in 2019 to combine the two SPDs, in order to comprehensively address air quality issues. Paragraph 4.15 of the Ipswich Local Development Scheme 2019 states:

‘It is proposed to incorporate the Parking Guidance for the IP-One Area SPD into the Low Emissions Strategy SPD. The reasoning is to ensure that the approach to parking in central Ipswich should not undermine actions to improve the Ipswich Air Quality Management Areas.’

The description below refers to two separate SPDs, because the early engagement on these matters pre-dated 2019.

Call for Ideas

In July 2015, and again in June 2017, the Council published a Call for Ideas for the Low Emissions Strategy SPD and the IP-One Parking Standards SPD. The consultation was carried out under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). On both occasions, the call for ideas was issued through a Local Plan Newsletter available on the Council’s web site, a specific web page linked to the ‘current consultations’ section on the Council’s home page and posted or emailed directly to everyone on the Local Plan database. A period of six weeks was allowed for comments to be submitted, between 6th July and 17th August 2015 and 14th June and 26th July 2017.

The comments received during the call for ideas scoping consultations are shown below, together with the Council’s response. All respondents are thanked for their constructive comments on the scope and content of the SPD.

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
Natural England	Natural England does not consider that these SPDs (Low Emissions or IP-One Car Parking Standards) pose any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	Comment noted.
Marine Management Organisation	With regard to the specific Supplementary Planning Documents for consultation, the MMO have no further comments to make on these.	Comment noted.
Ipswich Buses	The Low Emissions SPD relates primarily to transport emissions. Transport is a derived demand and its volume of use is determined by planning policies – every land use planning decision has a transport implication.	The scope of the SPD is more focused, seeking to guide applicants through processes such as air quality assessments. The issues

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	<p>The growth of car parks in Ipswich Town Centre, road improvements (such as that at the east end of Nacton Road), out of town employment and retail (such as the proposed Aldi store near Bramford Road), and housing developments near major roads, have and continue to have an effect upon overall energy use for transport – and consequently upon emissions.</p> <p>The four key approaches to reduce emissions should therefore be: -</p> <p>1) Focusing alternative fuel vehicle investments on vehicles working solely within the urban area – for example buses, taxis and local delivery vans with defined roles and high urban mileages. This also gives the option of using clean burning gas propulsion by investing in a filling station for a fleet of vehicles. This focus maximises the reduction of urban emissions for any given level of investment.</p> <p>2) Reducing the need for one person per car journeys by focusing facilities and development in Central Ipswich where there is plenty of land for development, much of it occupied by “bomb site” car parking. Putting facilities in a central point allows the provision of direct bus routes to a common destination, thus supporting the provision of (increasingly) frequent bus services. This in turn allows equal access for those who can and cannot drive, but in this context the benefit is that more people are conveyed on fewer vehicle movements (and therefore emissions) because the journey patterns are less dispersed.</p> <p>3) Encouraging those who need to travel in the urban area to share vehicles – for example by lift share, car clubs, using bus services or Park and Ride – or to walk or cycle. Providing these facilities is an important carrot, but it is also necessary to use parking charges and controls to influence choice, not only within the town centre but ideally at out of town sites (as residents have</p>	<p>raised by the respondent are addressed through existing Local Plan policies which are implemented through development management decisions. For example, the spatial strategy for locating development in Ipswich is determined through the Local Plan.</p> <p>Alternative fuel vehicle investments are not within the remit of this SPD. However, the Council has approved an Air Quality Action Plan 2019 which includes as ‘Priority 2’ renewal strategies for the bus fleet, taxis and the corporate fleet.</p> <p>The spatial strategy of the Ipswich Local Plan reflects this with higher density development required closer to facilities and services in the town centre or district centres.</p> <p>Some of the points made here are addressed through adopted Local Plan policies which protect the Bury Road park and ride site for future re-use, require provision for walking and cycling, and encourage car clubs (e.g. policies SP9 and DM17). Others will be addressed through the Ipswich Strategic</p>

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	<p>to drive through the urban area to reach them) and to reduce road space for cars by allocating space based on people rather than vehicles (which can be achieved by providing bus lanes). This approach should reduce the volume of traffic and emissions whilst increasing the number of people travelling into the town centre.</p> <p>4) Stacking inbound car traffic outside the town so that urban roads are not filled with stationary or slow moving polluting vehicles has the potential to positively influence the worst emissions areas, as well as making it easier to cycle, walk and use the bus within the town. Use of electric vehicles would mitigate local emissions, but it is unlikely that the UK will be able to meet the generating demands of a direct switch to electric vehicles. It is also questionable whether a major investment in electric vehicle infrastructure is a wise use of money (whether developer or public) when even schemes in dense urban areas have seen limited take up and technical issues. Ipswich's context in the midst of a deep rural setting, where users will fear scarce charging points and longer travelling distances, is a much less likely prospect.</p>	<p>Planning Area (ISPA) Transport Mitigation Strategy and action plan. The Transportation Mitigation Strategy includes a suite of proposals including reviewing parking charges. Ipswich is reviewing parking through its Parking Plan arising from the adopted option from the Ipswich Parking Strategy. Please note that the SPD does not address public car parks but the provision of parking within development such as offices and hotels.</p> <p>Managing the highways is the responsibility of the Highway Authority and would fall outside the scope of the Local Plan or the SPD. The UK Government has announced that the target for switching from fossil fuelled vehicles to cleaner fuels will be brought forward to 2035. People will only be able to buy electric or hydrogen cars and vans, once the ban comes into effect. The Local Plan already requires EV charging points or infrastructure provision within developments (policy DM17). The Highway Authority will determine what on-street charging infrastructure will be delivered.</p>
Ipswich Buses	Parking standards within this area have a fundamental impact on Ipswich Buses.	The draft SPD proposes a car parking standard for IP-One which consists of a zero minimum and then a maximum level of provision.

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	<p>There is much congestion within central Ipswich which impacts upon the attractiveness of bus services at key times.</p> <p>The pricing and control of parking is key to restraining vehicle use on the roads and controlling congestion within the town centre where there is good public transport access as well as a growing cycle network and improved walking routes. This is pertinent to the expanded area proposed.</p> <p>We would therefore be keen to see one vehicle per dwelling as a maximum residential development standard. This assumes that the vehicle is kept as a shared facility for leisure use and longer journeys for the whole household. The journey to work would either be a short walk or achievable by public transport for all those working. The adequate provision of sufficiently proximate and sheltered bus stops is presumed as part of the assessment of parking needs. It should be a clear general policy that where adjustments to bus routes or the provision of additional stopping facilities can be achieved this should take precedence over the provision of parking facilities.</p> <p>No parking spaces may be desirable for developments such as student accommodation, flats designed for one person, or areas where the developer commits to supporting a car club (whose vehicles function as the weekend / evening / emergency social vehicle for the household).</p>	<p>For smaller homes (1-2bed), the maximum proposed is 1 space per dwelling, but this increases for larger dwellings. The Council acknowledges that households may need to own a vehicle in order to make journeys which cannot be made using more sustainable modes. However, access to alternative modes including public transport within IP-One is good. Large developments would still need to undertake a transport assessment and may be required to submit a travel plan. Adopted policy DM17 already requires new development to be located within 400m of public transport.</p> <p>As stated above, the ISPA Transportation Mitigation Strategy includes a suite of proposals including reviewing parking charges. Ipswich is reviewing parking through its Parking Plan arising from the adopted option from the Ipswich Parking Strategy. Local Plan policies address the provision of new car parks (DM18, SP17). However, please note that the SPD does not address public car parks but the provision of parking within development such as offices and hotels.</p> <p>The standards allow for car free development.</p>

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	<p>We would agree that 10% of the Suffolk standard would be appropriate for operational non-residential.</p> <p>For employment and retail use within this area there is ample opportunity for access by public transport. Fewer spaces may be appropriate for certain sites. Some business may argue specific operational needs and this may be reasonable, but the use of any additional parking spaces needs to be subject to certain conditions, such as only being used for parking of works vans and a requirement to close off a parking space if the requirement for vans was reduced. There may also be exceptions where the working hours of the business are not within the operating times of public transport, although the first response to this would be for the business to seek to alter public transport operating hours.</p> <p>Monitoring is also a key part of mixed use provision, and should include provision for review of actual use of parking arrangements and withdrawal of spaces where use does not work out as planned.</p> <p>New development should also anticipate the need for the on-going funding of residents parking zones to ensure there is no overspill from new areas of activity into existing streets where there are existing patterns of parking and road use. (This can be crucial in avoiding disruption of bus services).</p> <p>Any parking that is provided needs to be designed as secondary to the provision of bus stops – i.e. the need for kerbs (100mm-140mm) to achieve accessible bus operation, the ideal locating of bus stops along walking routes, and the need for 31m clearways to ensure that buses can pull up against the kerb. The arrangement of parking in streets so that buses can pass through without weaving or delay is also crucial.</p>	<p>Agreed and the ISPA Transport Mitigation Strategy and Action Plan will support sustainable choices. Within the central Car Parking Core, only operational parking is allowed as per policy DM18. In the wider IP-One area, car free development would be allowed and there would a maximum level of provision lower than the Suffolk Guidance allows in the rest of the Borough.</p> <p>The Suffolk Guidance for Parking already covers the need to manage the impact of parking in connection with some uses (e.g. the hospital) on the surrounding area. Within IP-One, on-street parking is generally managed or prevented already because of the nature of the area.</p> <p>The SPD does not address the design of car parking as it is covered already through the Suffolk Guidance for Parking.</p>

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Westerfield Parish Council	We have noted the content and do not wish to make comment on the issues involved.	Comment noted
Historic England	No comment.	Comment noted
Suffolk County Council	Offer of support in the development of the SPDs.	Comment noted and informal consultation has been undertaken.
Cycle Ipswich	<p>The following ideas apply to both the low emissions SPD and the parking standards for the IP-One area SPD. Some suggestions may only apply to one of the submissions.</p> <p>I believe there should be a strong emphasis on the park and ride system, with options for park and cycle, and park and walk/jog/run also being encouraged from the park and ride car parks. Unfortunately, this is currently discouraged. This would then help with the public health objectives of the council in encouraging more people to be active, thus reducing health costs in the county. It also helps to reduce congestion and air pollution. I know several people would enjoy parking and cycling or running as an option to avoid the town traffic and incorporating exercise into their routine when the train isn't a suitable option for travelling to Ipswich. The park and ride should always be cheaper than parking in the town centre with a possible exception for those who are disabled.</p> <p>There should be provision to allow for car free, or minimal car developments within or near the town centre. In these cases, the levels of cycle parking and access to cycle and bus routes would be better than other developments, so that a car is not needed. Space should be provided for deliveries, people moving in and out, and short-term parking for example for visitors.</p> <p>The proposed island site would be an ideal location to operate a minimal motor vehicle site, where it would be primarily delivery vehicles, pedestrians, cyclists, and</p>	<p>The Park and Ride site is protected through the adopted Local Plan 2017. How services are organised is out with the scope of the SPD, but there may be scope to widen the use of facilities (e.g. for park and cycle) through the ISPA Transport Mitigation Strategy and Action Plans. The Action Plan regarding funding arrangements is being taken forward through a working group and will be published as a technical paper when completed. In parallel, the highway engineers are working on options appropriate for Ipswich. When these work streams are completed, they will be reported to the ISPA Board which includes members and will be reported back to the authority.</p> <p>The proposed parking guidance allows for car free development within the whole of IP-One but would also allow a maximum level of provision for homes across the area, and for other development outside the Central Car Parking Core.</p>

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	<p>importantly a connection to the railway station and park and ride by bus.</p> <p>Ipswich needs a car club, ideally with electric or hybrid vehicles so that people can share vehicles which generally spend the majority of their time parked doing nothing. By sharing the vehicles with others nearby, it would reduce costs per person, fewer vehicles would be required in the town, less congestion would occur as most people would use alternative forms of transport for more of their shorter journeys.</p> <p>Traffic signals need to much more dynamic than they are currently, as I regularly see them giving a green light to air when there are no vehicles approaching, yet there are people waiting for the next phase of the lights. This would reduce congestion, and mean people (in any form of transport whether walking, cycling, or driving) are more likely to cross or wait for the green light.</p>	<p>The Local Plan encourages car clubs (Policy DM17), but to date there has not been widespread take-up in Ipswich. Ways in which to facilitate car clubs are being discussed with Suffolk County Council. Indeed, a new Car Club which is planning to start up was discussed at a specific meeting with Suffolk County Council last week (w/c 27 July 2020).</p> <p>The sequencing of traffic lights is a matter for the Highway Authority and is tied into the Ipswich Urban Traffic Management and Control system. Usually sequencing is used to favour public transport and emergency vehicles and to try to reduce congestion. The shift to electric vehicles and vehicles which cut out when stationary will reduce the air quality impact year on year.</p>
Northern Fringe Protection Group (NFPG)	<ol style="list-style-type: none"> 1. A key purpose of this SPD must be to protect human health by reducing harmful emissions. A main focus must be to improve air quality and eradicate the existing Air Quality Management Areas in Ipswich, which breach European legislation and are proven to damage human health. 2. No new development above a certain size (to be defined) should be allowed to proceed without mitigation measures that would ensure no further increase to the current exceedances in any AQMA. A planning application should only be allowed to proceed if it is accompanied by sufficient evidence that demonstrates this. 	<p>The SPD proposes that every development application will need to be accompanied by an appropriate 'scheme air quality mitigation statement', which outlines the site type and the measures proposed, based on the development's scale. The requirement applies where there is new floorspace created or there are changes of use proposed. A new policy DM3 has been included in the emerging Local Plan which requires</p>

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	<p>3. The Core Strategy needs to be improved in CS5, CS20, DM5, DM15 and DM16 to ensure that development should not worsen air quality in AQMAs and around schools during travel to school periods, most notably the morning rush hour.</p> <p>4. IBC should commit to working with SCC and neighbouring authorities to eradicate all Ipswich AQMAs within an agreed timescale.</p>	<p>that proposals do not negatively impact on existing air quality.</p> <p>The Council is working to improve air quality through all the avenues open to it: the Local Plan, this SPD, the ISPA Transport Mitigation Strategy and Action Plans and the many strands of activity identified through the Air Quality Action Plan.</p>
(NFPG)	<p>"We are pleased to see that Ipswich Borough Council finally plans to tackle the longstanding air quality issues in Ipswich through an Air Quality Action Plan and Low Emissions Strategy SPD, which need to be fully consistent. We feel that the Local Plan is generally appropriate in relation to carbon emissions but more needs to be done to improve air quality in Ipswich. This should be the priority of the Low Emissions Strategy SPD. We have previously raised our concerns at the insufficient attention paid by the Local Plan to improving air quality in Ipswich and urge the Council to strengthen the relevant sections to improve the health of Ipswich residents. Closer working with health professionals to improve air quality should form a key part of the SPD.</p> <p>For far too long the poor air quality in Ipswich has been ignored by the Council despite concerns being raised with no remedial action taken. This will have resulted in early deaths of Ipswich residents and increased the level of respiratory diseases of those people that live, walk or cycle in the AQMA areas. This is of particular concern for young children attending Handford Hall, St Matthew's, St Helen's, St Margaret's primary schools and Wellington nursery. The Council has neglected its responsibility to protect its residents from harm in AQMA areas and needs to rectify this as a priority. The starting point for this is to have accurate and robust data of actual emission levels. This should include PM2.5 "fine" particles.</p> <p>We are extremely concerned that insufficient resources are being provided to maintain and operate the monitoring equipment. We</p>	<p>As explained above, a new policy DM3 has been included in the emerging Local Plan which requires that proposals do not negatively impact on existing air quality. The emerging Local Plan has also been subject to a health impact assessment.</p> <p>The adopted 2017 Local Plan and the 2011 Core Strategy DPD before it identified improving accessibility and supporting modal shift from the car as a key objective. The Council's first Air Quality Action Plan was published in 2008 and followed up through progress reports. A new Action Plan was adopted in 2019. Therefore, the Council considers it has not ignored air quality. Nevertheless, this should not detract from the fact that air quality remains an issue in parts of the Borough and needs continued effort in order to protect the health of residents and visitors.</p>

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	<p>question the reliability of the equipment and have no confidence in the averaging and extrapolation methodology utilised. Without real data, this desktop approach is guaranteed to fail to identify any high “spot” concentrations which are the most damaging to human health. Without real data, Ipswich Borough Council will not be able to guarantee the health and wellbeing of its residents. In this respect it is worth noting that the AQMAs occur in areas that are already subject to high levels of deprivation and poor levels of health below Ipswich and national averages. Ipswich Borough Councillors should be doing much more to protect people living and walking in and around Westgate and Alexander Wards by not subjecting them to damaging levels of harmful pollutants. The SPD must improve the current monitoring equipment and increase the availability of real data so that high “spot” concentrations, which are the most harmful, can be identified and tackled accordingly. Improved monitoring of PM2.5 is also required."</p>	<p>The Council currently is satisfied with the scope of its air quality monitoring program, in particular, with regards to monitoring concentrations of NO2. Nonetheless, the program is reviewed annually with any changes to the monitoring program reported on in Annual Status Reports.</p> <p>The Council is also currently working the in partnership with Suffolk County Council and the University of Suffolk (UoS) on a Smarter Suffolk Live Labs trial. The trial is a two-year project led by Suffolk County Council and is funded by the Department for Transport (DfT). The air quality monitors included as part of the project measure for NO2, PM10, PM2.5 and O3. It is hoped that the trial will help Suffolk County Council decide what types of sensor to introduce on a larger scale to help deliver a better road network and develop initiatives aimed at improving air quality. The Council will support Suffolk County Council with the project and help determine the value of the data generated.</p> <p>Background data published by DEFRA indicates that levels of PM2.5 are well below the air quality standards. Furthermore, the recent Air Quality</p>

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		<p>Assessment carried out as part of the Local Plan Review predicts that annual mean PM2.5 concentrations will continue to be below air quality standards for the period of planned growth within the emerging new Ipswich Local Plan until 2036.</p> <p>Despite the above, the Council recognises that the World Health Organisation indicates that there is no safe level for exposure to particulates. Central Government will need to determine whether they will require Councils to meet the WHO's guidelines or possibly an even stricter target. This may happen in the future emerging Government policy. Despite this, the Council continues to aspire to reducing levels of air pollution to as low as practicable.</p> <p>Particulates are modelled nationally. PMs behave in a different way from N2 and therefore up to now the Council has considered the national modelling to be sufficient. Whether it is necessary for local monitoring is under consideration.</p>
NFBG	<p>"As we previously warned, the total reliance on Euro standards to improve air quality in Ipswich has failed. We acknowledge that the latest Euro standards, which are more robust, will eventually improve air quality. However, this will take time to filter through the vehicle fleet and will be negated by increased traffic from the many new developments in and around the town centre,</p>	<p>Air quality modelling for the emerging Local Plan has been carried out and is available in the Core Document Library on the Council's website, reference D33</p>

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	<p>including the many developments in neighbouring authorities on the edge of the Borough. Ipswich Borough Council needs to implement its own measures to reduce air pollution in and around the existing AQMAs. This will involve close working with Suffolk County Council as the Highway Authority. It is inevitable that some form of Northern Relief Rd for Ipswich will be required in order to improve air quality in Ipswich and this should be promoted within the SPD. In Ipswich the major source of air pollution is traffic, and this should be the main priority of the SPD. The starting point for action (and the SPD) should be the NICE guideline Air pollution: outdoor air quality and health [NG70] June 2017, with the focus on reducing emissions from traffic. In particular Ipswich Borough Council through the SPD should:</p> <ul style="list-style-type: none"> - Introduce a Clean Air Zone for Ipswich, which “aims to reduce exposure to air pollution across the whole zone rather than focusing on air pollution hotspots”. - Require all new developments to implement measures to ensure that traffic from new developments does not worsen air quality in the Clean Air Zone and the AQMAs. - Incorporating air quality outcomes into Travel Plans for new developments. - Use the taxi licensing regime to reduce emissions from the Ipswich taxi fleet by specifying minimum emission standards for private and other licenced vehicles. - Reduce the emissions from the Ipswich Bus fleet. Most of the fleet only meets Euro 2&3 standards (of 7&5 g/kWh compared to Euro6 standards of 0.4g/kWh. If IBC is serious about improving air quality in and around the town centre it must reduce bus emissions as a priority. - Enforce the requirement for drivers to turn off engines when stationary. This particularly applies to bus drivers and vehicles outside schools. It is particularly noticeable that taxis parked in Lloyds Avenue generally have their engines turned off whereas buses at Tower Ramparts are often left running. Why is this? - Press for the reinstatement of the Norwich Rd Park & Ride. - Work with SCC to encourage cycling by making it safer and improving cycling 	<p>https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d33 - _ipswich local plan review aqa vol 1 report final.pdf</p> <p>Suffolk County Council resolved in February 2020 not to progress the Ipswich Northern Routes project.</p> <p>The SPD focuses on how air quality will be considered through the planning application process, and the appropriate level of parking provision with developments in IP-One. The SPD does not make policy but provides information to support the implementation of the Local Plan.</p> <p>Clean Air Zones and congestion charging zones can have the undesired effect of pushing traffic, and therefore pollution, into other areas outside the zone in order to avoid the charges. However, they remain a longer-term possibility if more positive measures are not deemed successful in delivering modal shift. The ISPA Transport Mitigation Strategy indicates the Highway’s Authority’s approach: ‘These (Clean air zones and congestion charging) are considered to be measures that would be introduced in the longer term once the effectiveness of the programme of measures</p>

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	<p>infrastructure through the provision of more dedicated cycle lanes and better road maintenance.</p> <p>- Improve the “green lungs” in and around AQMAs."</p>	<p>identified in this report have been explored.'</p> <p>https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf</p> <p>Other key documents which have an important role in addressing air quality in Ipswich sit alongside the Local Plan and this SPD: the IBC Air Quality Action Plan 2019, the SCC and ISPA Transport Mitigation Strategy 2019 and action plan (in preparation), the SCC Cycling and Walking Infrastructure Strategy (in preparation) and the refresh of the SCC Local Transport Plan (also underway). Some actions which may not be appropriate through the SPD may be possible through these documents, for example fleet management measures.</p>
NFPG	<p>"The SPD should ensure that there are no premature reductions to AQMAs unless there is clear evidence that there are no harmful “spot” concentrations of pollutants. We strongly disagree with the removal of St Margaret’s Plain and Fonnereau Rd from AQMA2. It is too early to do so given:'</p> <p>- The increase in capacity of St Margaret’s primary school, which will increase traffic and mean more school children, will be subject to poor air quality.</p> <p>- The forecast Increased traffic from the Ipswich Garden Suburb on both these areas.</p> <p>- The impact of Travel Ipswich on traffic flows at the bottom of Fonnereau Rd and Bolton Lane. Traffic queues at these junctions appear to have increased since the introduction of the scheme throughout the day.</p>	<p>The process of declaring or amending AQMAs is out with the scope of the SPD. This is led by the Council’s Environmental Health Department.</p> <p>Any changes to the AQMAs are made in light of robust monitoring data and/or a detailed modelling study.</p> <p>St Margaret’s Plain is still included within AQMA 2 and the Council continues to monitor pollution levels at Fonnereau Road which remain below the annual</p>

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	<p>- The demolition of the old KwikFit building will have temporarily improved the ability for pollutants to dissipate.</p> <p>- The proposed new school at the old Co-op is likely to impact of traffic flows.</p> <p>Given the number of schoolchildren in this area it would be irresponsible of Ipswich Borough Council to remove St Margaret's Plain from the AQMA at this time. Likewise, until the impact of Travel Ipswich has been fully assessed, we believe there should be no changes to the existing AQMAs. We note that Ipswich Borough Council has widely stated that Travel Ipswich has failed so to reduce the boundaries of the existing AQMAs is clearly premature and we urge the Council not to further risk the health of its residents. We support the creation of AQMA5, especially given the number of pedestrians using this route and the proximity of St Matthew's primary school. The SPD should consider the creation of a single AQMA which could then form the basis of a Clean Air Zone for Ipswich. "</p>	<p>mean national objective level for NO2.</p>
NFPG	<p>"The proposals contained within the Ipswich Garden Suburb SPD for sustainable travel and within the planning conditions for Planning Application: 16/00608/OUT Crest Nicholson Land North of Railway and East of Henley Road are a starting point to forming the basis of the SPD in relation to new developments. However more needs to be done to improve the sustainable travel experience outside of new developments which needs to be addressed by the SPD. Sufficient resources also need to be made available for the Council to monitor and assess the effectiveness of the developer's travel plans and to require them to take remedial action when required. The SPD needs to consider how this is best delivered. The SPD should also ensure that neighbouring planning authorities implement the same requirements on new developments close to Ipswich as Ipswich Borough Council does within its boundaries. We support concept of the Council's Cycling Strategy SPD, but this does not sufficiently address the major issues cyclists face in the town centre, which will be a barrier to delivering the Air Quality SPD. The Local Plan is heavily dependent on increasing</p>	<p>The Ipswich Garden Suburb SPD and the outline planning permission are both specific to a particular scale and location of development and therefore may not be applicable to different developments in Ipswich. The consultation draft of the SPD sets out examples of core measures expected in all developments and then additional measures for medium and large-scale developments.</p> <p>Travel planning forms part of the menu of measures and has been given greater weight in the emerging Local Plan through policy DM21. The SCC and ISPA Transport Mitigation Strategy and action plan extend the area of focus outside the Borough</p>

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	<p>sustainable travel and the number of cyclists travelling to and across the town centre. Unless cycling across the town centre is improved, especially between 10.30 and 16.30 when access is not allowed across pedestrian areas, it will be impossible to achieve the required shift to cycling required for the Local Plan and to improve air quality. In particular, new cycle routes will be required to the old Sproughton Sugar Beet Factory site and from the proposed Ipswich Garden Suburb to the employment, leisure and education centres based on the Waterfront are required. However, improving cycling infrastructure should not be at the expense of other road users. Solutions are required that allow all road users to travel safely and efficiently around Ipswich and all decisions should be driven by robust business cases.</p> <p>All too often cycling schemes in Ipswich are ill-conceived – for instance the dangerous counter flow cycling lane on Northgate Street, the Tuddenham Rd roundabout modifications (which were removed after an increase in accidents), narrow shared space pavements that cannot safely handle pedestrians and cyclists. The latest example is the painting of white lines on the Christchurch Park bridleway, which is in urgent need of resurfacing, that have made it even more dangerous by giving the false impression that the surface between the lines is safe to cycle on (which it is not) with the potholes/ruts often concealed by leaves. It defies belief how anyone can possibly consider this to be a good idea and is indicative of the sticking plaster approach currently applied to cycling infrastructure in Ipswich. IBC needs to detail the actions that it will undertake to improve Air Quality by improving the cycling Infrastructure. "</p>	<p>boundaries in recognition that traffic from the ISPA area affects central Ipswich.</p> <p>Commitment from the Highway Authority is needed to implement cycling route improvements. SCC is leading work currently on the Cycling and Walking Infrastructure Plan, which will be an important mechanism through which to identify and deliver specific improvements. There may also be longer term impacts on the cycling network as a result of short-term changes made during the Covid-19 Pandemic. SCC published a draft Cycling and Walking Infrastructure Plan in June 2020 and invited comments on it.</p>
Suffolk County Council	<p>"The Local Plan did highlight the emerging SPD but only regarding electric vehicles and approaches to car clubs. The themes highlighted in the call for ideas is much broader, reflecting wider consideration of air quality, which relate to a different range of objectives and policies. For example:</p> <ul style="list-style-type: none"> · Objective 2 (reducing carbon emissions); · Objective 11 (air quality); 	<p>Over the course of the preparation of the SPD (previously two separate SPDs), some aspects of national and local policy have moved on. For example, nationally, the use of electric vehicles is becoming more mainstream. Locally, the</p>

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	<ul style="list-style-type: none"> · Policy DM1 & 2 (reducing carbon emissions) · Policy DM 5h (air quality) · Policy DM 17b (air quality) · Policy DM17c (reducing carbon emissions) <p>Whilst the two objectives are connected (produces carbon and nitrogen dioxide emissions), the policy responses are separate. The combination would make for a more robust document but would be less straight forward to prepare.</p> <p>There are several other linkages which could be included in the scope. Policy DM 26, protection of amenity, is related to air quality, specifically where it may be detrimental to human health. The use of vegetation and hedgerows to absorb pollutants is linked to Policy DM 10, in preventing the loss of trees and hedgerows, but also to Policy CS 3h (IP One area) regarding urban greening. Planting coniferous trees tends to be better for absorbing gases owing to larger surface area combined with all year leafing. Ash, larch, and silver birch are also amongst the best trees for absorbing pollutants.</p> <p>In terms of electric vehicle charging points, the SPD could quickly become out of date because the take up and provision is changing rapidly. There is scope to provide assistance to developers to incorporate ducting and other design features in relation to off-street car parking. There is also scope to set out, with Suffolk County Council as the Highway Authority, what parameters should be considered in designing on-street charging points in developments.</p> <p>The transport, environment strategy, planning and public health teams within the County Council will support the development of the SPD by providing advice and evidence where appropriate."</p>	<p>policy approach to air quality is evolving insofar as the emerging Local Plan sets out a new policy DM3 dealing with air quality. Over the course of preparing the SPD, its scope has moved towards setting out a robust mechanism for assessing air quality impacts and identifying appropriate mitigation strategies for individual developments through the planning application process.</p> <p>However, the SPD does refer to the full range of measures which could be employed to reduce air quality impacts, both of and affecting a development. This includes design and layout measures, green infrastructure and planting measures, and sustainable transport measures. The latter links to the approach to car parking in IP-One which is also set out through the SPD. The public consultation will provide feedback on whether the guidance set out in the SPD is sufficiently detailed.</p>
Respondent	Call for Ideas comments received 2015 and 2017	IBC Response
Suffolk County Council	The County Council would be pleased to continue collaborating with the Borough Council on the development of a parking strategy for Ipswich Town Centre, and this SPD should be closely linked to the parking strategy being developed. As noted in the Third Suffolk Local Transport Plan, a key challenge in Ipswich is to support economic	The adopted Local Plan already recognises the need to strike an appropriate balance between the needs of the economy of the town centre and the need to avoid overprovision of car parking which can result in

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	<p>growth without adding to existing problems. The following matters are key considerations:</p> <ul style="list-style-type: none"> - Supporting the economic growth of Ipswich Town Centre. <p>Ipswich town centre is an important employment and service centre, fulfilling a central role for much of Suffolk. Local Plans – in and around Ipswich – identify levels of growth which will enhance Ipswich town centre’s role as a key centre.</p> <p>Parking in IP-One must contribute to the competitiveness of the town centre. As the Borough Council’s notes and suggested questions identify, this is both a qualitative and quantitative issue.</p> <p>Notwithstanding issues relating to congestion, sustainable transport, and air quality, set out below, the SPD must seek to encourage appropriate parking in quantities and to a standard which enables businesses to encourage customers to visit their premises, for adequate servicing, and for firms to recruit and retain staff. The Local Transport Plan and Ipswich Local Plan both distinguish between long-term and short-term parking. The former supports commuting with effects on peak hour congestion and the latter is of great importance to the town’s retail offer.</p> <p>The Ipswich Vision, to which both our authorities are committed, seeks to promote an ‘experiential’ town centre. The SPD should consider the role that parking plays in the overall experience of Ipswich town centre – for shoppers, for those visiting for business or leisure and for those who live and work in the town.</p> <p>Proposals relating to the quality of town centre parking could include the introduction of new technologies and design measures to improve the quality of the environment in and around parking. Policy DM18 of the Ipswich Local Plan neatly summarises priorities for parking to ‘be secure, sheltered, conveniently located, adequately lit, step-free and accessible.’ The Association of Town Centre Managers paper, ‘In-Town Parking: What Works?’¹, includes analysis of relevant ways in which parking contributes to a town centre’s ‘offer’.</p> <ul style="list-style-type: none"> - Recognition of the role of parking in managing traffic and encouraging a shift to more sustainable modes of transport. 	<p>congestion and air quality impacts (see policy SP17).</p> <p>The Council has published the Ipswich Parking Strategy prepared jointly with the County Council and is now moving on to prepare an Ipswich Parking Plan to set out the approach to public car parking provision in the town centre. This will address the provision of parking for commuters and shoppers.</p> <p>The SPD should not pre-empt this work, therefore the focus of the SPD is solely on car parking provision within developments.</p> <p>The guidance proposed addresses parking in residential development across the whole of IP-One. It addresses parking provision in non-residential development outside the Central Car Parking Core but within the IP-One boundary. For both it proposes to permit car-free development and identify a maximum level of provision that would be permitted.</p> <p>Some of the more detailed points about parking design will need to be picked up through the Ipswich Parking Plan work.</p>

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<p>SCC continued</p>	<p>Balanced alongside the requirement to encourage easy and attractive access to the town centre is a necessity to reduce the need to travel and, when people do travel, to prioritise healthy and sustainable modes. Limiting congestion through modal shift will support the Ipswich economy as well as the environment.</p> <p>Parking can play a part in encouraging modal shift and, for 'operational car parking', the Borough's consultation document proposes setting a maximum standard of only 10% of that set out in the Suffolk Guidance.</p> <p>The countywide guidance notes that lower provision for A, B, C1 and D class uses may be appropriate where there are sufficient public transport alternatives. Ipswich town centre is comparatively well served, albeit with variations within the town centre, so the County Council would welcome a discussion about appropriate standards and thresholds for different types of use. As noted elsewhere in this letter, there is a distinction to be made between long-term and short-term parking. In respect of residential parking (i.e. origin parking), the Countywide Guidance also recognises that a reduced minimum standard may be appropriate in urban areas where a development is exceptionally sustainable in transport terms.</p> <p>The Parking SPD should require sufficient cycle parking to encourage increased cycling, helping to implement Policy CS5 of the Ipswich Local Plan. The public health benefits of making cycling more convenient are also clearly relevant. Good quality electric cycle parking is needed.</p> <p>The SPD could usefully explain the relationship between parking and travel plans, which include measures to reduce the highway impact of development proposals. Car clubs, and provision for them, can form an important part of a sustainable transport package.</p> <p>Finally, the SPD should recognise the role which Park and Ride plays as part of the town's overall parking offer.</p> <p>- Assisting efforts to manage air quality issues in the town centre.</p> <p>Allied to reducing congestion, properly managed parking could, by encouraging modal shift, help reduce vehicular emissions. There are four declared air quality monitoring</p>	<p>Outside the Central Car Parking Core (defined through adopted policies DM18 and SP17) the draft SPD proposes a maximum level of provision in commercial developments of half the County provision. Thus, where the Suffolk Guidance for Parking suggests 1 space per 30 sq m of office space, within IP-One it would be 1 space per 60 sq m. The SPD acknowledges that, because the IP-One area was defined on the basis of regeneration opportunities and ambitions rather than public transport accessibility, there may be areas of IP-One where distance from the main transport hubs will also need to be a consideration.</p> <p>For operational parking, rather than setting out a standard the draft SPD explains what the Local Plan policy means by operational parking and how applicants will need to make the case for the operational parking needed. It very clearly does not include general staff parking.</p> <p>For residential parking, the minimum would be car free development and the SPD sets out a sliding scale of maximum provision depending on the sites of the homes provided.</p> <p>The Council considers that travel plans and park and ride are more appropriate for the ISPA Transport Mitigation Strategy and action plan to address, not least because these are joint documents in</p>

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	<p>areas – a specific transport issue which the Parking SPD could recognise. The SPD should be linked to Policy DM17b), which seeks to prevent new development which has a significant impact on air quality.</p> <p>- Recognising the needs of different people</p> <p>1 http://thegreatbritishhighstreet.co.uk/pdf/GBH-S-What-Works.pdf?</p> <p>2 Design and accessibility measures in the SPD will need to reflect the needs of people with different mobility requirements. The Suffolk Advisory Guidance sets out sources of information on disability accessibility requirements for parking. However, given Ipswich and Suffolk’s ageing populations, the Borough Council could consider ways in which the Lifetime Neighbourhoods principles could be embedded into parking design.</p>	<p>which the Highway Authority has a stake. Car clubs, whilst encouraged through the adopted Local Plan, have not proved a popular solution in Ipswich. However, it remains part of the menu of measures that applicants could consider to mitigate development impacts.</p> <p>Cycle, powered two-wheeler and disabled parking provision will remain as per the Suffolk Guidance for Parking.</p>
Ipswich Buses	<p>Parking standards within this area have a fundamental impact on Ipswich Buses. There is much congestion within central Ipswich which impacts upon the attractiveness of bus services at key times.</p> <p>The pricing and control of parking is key to restraining vehicle use on the roads and controlling congestion within the town centre where there is good public transport access as well as growing cycle network and improved walking routes. This is pertinent to the expanded area proposed.</p> <p>Keen to see one vehicle per dwelling as a maximum residential standard. This assumes that it is kept as a shared facility for leisure use and longer journeys for the whole household. The journey to work would either be a short walk or achievable by public transport.</p> <p>The adequate provision of sufficiently proximate and sheltered bus stops is presumed as part of the assessment of parking needs. It should be a clear general policy that where adjustments to bus routes or the provision of additional stopping facilities can be achieved, this should take precedence over the provision of parking facilities.</p> <p>No parking spaces may be desirable for developments such as student accommodation, flats for a single person, or</p>	<p>Public car parking for commuters and shoppers (and pricing regimes) are out with the scope of this SPD. These aspects of parking will be taken forward through the Ipswich Parking Plan to be prepared and the ISPA Transportation Mitigation Strategy. The latter includes a suite of proposals including reviewing parking charges. Ipswich is reviewing parking through its Parking Plan arising from the adopted option from the Ipswich Parking Strategy.</p> <p>This is the maximum proposed for smaller dwellings in IP-One of 1-2 bedrooms. However, the proposed maximum increases with the size of the home. The SPD is clear that car free housing would be acceptable also, there is no minimum level of provision, unlike in the remainder of the Borough.</p>

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	<p>areas where the developer to support a car club (whose vehicles function as the weekend/evening/emergency social vehicle for the household).</p> <p>Agree that 10% of the Suffolk standard would be appropriate for non-residential. Fewer spaces may be appropriate in some cases. Some businesses may argue specific operational needs, and this may be reasonable, but the use of any additional spaces needs to be the subject of conditions to control the use of the spaces. There may also be exceptions where the working hours of the business are not within the operating times of public transport, although the first response to this would be for the business to seek to alter public transport operating hours.</p> <p>Monitoring is a key part of mixed provision, and should include provision for review of actual parking arrangements and withdrawal of spaces where use does not work out as planned.</p> <p>New development should anticipate the need for on-going funding of residents parking zones to ensure there is no overspill from new areas of activity into existing streets where there are existing patterns of parking and road use.</p> <p>Any parking provided needs to be designed as secondary to the provision of bus stops. The arrangement of parking in streets so that buses can through without delay is also crucial.</p>	<p>The Local Plan policy DM17 already requires development to be within 400m of public transport and to facilitate its use as a basic requirement of all new development.</p> <p>For non-residential development outside the Central Car Parking Core, (defined through adopted policies DM18 and SP17) the draft SPD proposes a maximum level of provision in commercial developments of half the County provision. Thus, where the Suffolk Guidance for Parking suggests 1 space per 30 sq m of office space, within IP-One it would be 1 space per 60 sq m. The SPD acknowledges that, because the IP-One area was defined on the basis of regeneration opportunities and ambitions rather than public transport accessibility, there may be areas of IP-One where distance from the main transport hubs will also need to be a consideration.</p> <p>For operational parking, rather than setting out a standard the draft SPD explains what the Local Plan policy means by operational parking and how applicants will need to make the case for the operational parking needed. It very clearly does not include general staff parking.</p> <p>The SPD addresses monitoring and enforcement, where planning conditions are not complied with.</p> <p>The SPD does not currently address residents' parking</p>

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		<p>zones. However, on-street parking is already controlled through much of IP-One owing to the nature and location of the area in the centre of the town.</p> <p>Design aspects of car parking are not covered by the SPD as they are addressed in detail through the Suffolk Guidance.</p>
Private individual	<p>There should be a strong emphasis on the park and ride system, with options for park and cycle/walk/run also being encouraged. The park and ride should always be cheaper than parking in the town centre with a possible exception for those who are disabled.</p> <p>There should be provision to allow for car free or minimal car developments within or near the town centre. In these cases the levels of cycle parking and access to cycle and bus routes would be better than over developments. Space should be provided for delivers or short-term parking, i.e. visitor parking.</p> <p>The proposed Island site would be an ideal location to operate a minimal motor vehicle site</p> <p>Ipswich needs a car club, ideally with electric or hybrid vehicles so that people car share vehicles. By sharing vehicles it would reduce the cost per person, fewer vehicles would be required in the town, less congestion would occur as most people would use alternative forms of transport for shorter journeys.</p> <p>Traffic signals need to be much more dynamic, as regularly seen giving a green light to air, yet there are people waiting for the next phase of the lights. This would reduce congestion, and mean that people (in any form of transport) are more likely to cross or wait for the green light.</p> <p>Ipswich needs a car club, ideally with electric</p>	<p>The Park and Ride site is protected through the adopted Local Plan 2017. How services are organised is out with the scope of the SPD, but there may be scope to widen the use of facilities (e.g. for park and cycle) through the ISPA Transport Mitigation Strategy and Action Plan. Therefore, this suggestion has been passed to Suffolk County Highways. Charging regimes are also out with the scope of the SPD.</p> <p>The proposed parking guidance allows for car free development within the whole of IP-One, but would also allow a maximum level of provision for homes across the area, and for other development outside the Central Car Parking Core.</p> <p>The Local Plan encourages car clubs (Policy DM17) but to date, there has not been widespread take-up in Ipswich. Ways in which to facilitate car clubs will be discussed with Suffolk County Council. Indeed, a meeting was held to discuss a possible start up new car club with the county council w/c 27 July.</p>

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		The sequencing of traffic lights is a matter for the Highway Authority and is tied into the Ipswich Urban Traffic Management and Control system. Usually sequencing is used to favour public transport and emergency vehicles and not cars except in areas of specific congestion. The shift to electric vehicles and vehicles which cut out when stationary will reduce the air quality impact year on year.
Historic England	No comments to make.	Comment noted
Natural England	Natural England does not consider that these SPDs poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	Comment noted
Marine Management Organisation	With regard to the specific Supplementary Planning Documents for consultation, the MMO have no further comments to make on these.	Comment noted.