

## **Matter 9 – Implementation and Monitoring**

Representations 26497, 26507, 26509, 26525, 26531, 26530

### **251. Is the strategy for implementation, monitoring and review appropriate and robust?**

No.

The evidence base clearly shows that lack of progress of delivering modal shift and compliance with legally binding air quality targets as well as reducing carbon emission from road traffic to 2004 levels. There is no assessment that the Plan will be able to comply with air quality levels in its early years or that planned growth will not add to existing air quality problems. IBC has also not provided evidence that the required levels of modal shift of 15% by 2026 assumed in the traffic modelling are achievable and that IBC will be able to deliver them in the required timeframe to make the Plan sound. Given the high risk that required modal shift and legally binding air quality levels will not be achieved then the implementation, monitoring and review strategy needs to include specific targets/objectives in relation to these issues. Without these it is neither appropriate nor robust enough for the Plan to be sound.

The recent Authority Monitoring Report, 2018/19 May 2020 (E1) Objective 6 Accessibility target - To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031 reported the assessment of progress against this target as *“The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review”*. This is clearly totally inadequate. We note that the Authority Monitoring Report, 2017/18 June 2019 (E2) contained the same comment. In our opinion, IBC needs to provide the Inspector with details of how it will be monitoring and reviewing progress in a sufficiently robust manner to deliver the levels of modal shift required to make the Plan sound.

**OBJECTIVE 5 AIR QUALITY AND CLIMATE CHANGE must include a target to comply with legally binding air quality legislation. Clearly this needs to be sooner rather than later to protect human health. We suggest this set for 2022/23. This is far more appropriate than the proposed target “To reduce the level of identified air pollutants in the National Air Quality Strategy”, which could be achieved by a reduction of just 1% and still substantially above legally binding limits.**

**It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear.**

**OBJECTIVE 6: TRANSPORT AND CONNECTIVITY should include a target to achieve 15% modal shift as used in the traffic modelling and measure progress against this. Achieving this modal shift target is critical to the success of the IGS and the Plan. It clearly needs to be monitored and reviewed accordingly.**

We agree that the Local Plan Authority Monitoring Report should review progress on delivering the major projects and infrastructure requirements outlined in Chapter 10. However, as currently drafted it does address the issue of timely delivery, which the Plan is reliant upon to prevent traffic congestion, deliver the required levels of modal shift and to mitigate the impacts on air quality. In particular, the Strategy needs to ensure that infrastructure improvements to the road and sustainable travel networks required as part of the IGS are delivery in time to achieve the modal shift targets.

We note that IBC had targets in the current Local Plan (**22nd February 2017**) and the previous Local Plan (December 2011) to achieve a 15% modal switch for journeys in Ipswich by 2031 and 2021 respectively (Objective 6). IBC needs to provide evidence that it has made sufficient progress against these targets over the past decade to demonstrate the Plan to be sound. As IBC has been committed for the past 10 years to delivering substantial modal shift, we would expect IBC to already know the required modal shift infrastructure and have a delivery plan for it. If IBC cannot provide this detail, what evidence is there that it will be able to deliver the Plan?

Tables 8A and 8B should therefore include the required modal shift infrastructure and road network improvement projects, estimated cost and a date by which they are required to be delivered in accordance with the transport modelling assumptions for the CS to be sound so that it can be monitored and reviewed appropriately. The strategy for implementation, monitoring and review needs to address the issue of timely delivery of this infrastructure for it to be appropriate and robust for the Plan to be sound.