



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Ipswich Draft Local Plan Examination **Further Comments on Household Projections Matter 2**

This document is in response to a letter from the Inspector's Office dated 8th August 2016 inviting comments on a note produced by IBC during the hearings based on the 2014 Household Projections, referred to in our comments as 'The Note'.

The Note clearly illustrates the vast difference between Luton Trend and DCLG projections. It also shows that Luton Trend starts from a higher 2011 baseline of 58,717 than the DCLG (2014 Base) of 57,455 and Census data of 57,298¹, which by 2016 results in a difference of 2,902 households (1st Table in document). Not only is the Luton trend forecast for 2016 higher than the DCLG (2014 Base) by 2902, in reality the difference for 2016 is even greater than 3000 as can be seen below.

Table 2 of the draft Local Plan² shows the number of new dwellings constructed in Ipswich between April 2011-2014 was 1077 and the number under construction as 704. If we assume all the dwellings under construction were completed and occupied by April 2016 then the increase in the number of households between April 2011-2016 was approximately 1781, (note in practice the number of households will typically be 3% lower than the number of dwellings due to vacant properties but this will be much higher for newly built properties awaiting sale. So this can be considered an optimistic assumption). If we add this to the 2011 DCLG (2014 Base) we get 59,236 and to the 2011 Census data we get 59,079 compared with the Luton trend forecast of 62,260 i.e. the Luton trend forecast for 2016 is at least 3000 too high.

Clearly the baseline needs to be corrected with actual data. A simple re-basing of the data to 2016, all things else remaining equal, will lower the Luton trend 2011-2031 forecast by 3000 to 10,530. We believe it should be much lower and more in alignment with the DCLG (2014 Base) forecast of 7799.

The Note fails to mention that housing completion figures saw a spike immediately prior to the recession, which resulted in an oversupply of flats in Ipswich, most notably around Ipswich docks. From the Ipswich HMA Annual Completion table shown in The Note and referenced from AMR 2014/15, it can be seen that the average completions between 2006/7 – 2010/11 were 805 per annum, 4 years of the 5-year period used in the Luton Study. Contrast this with the housing completions between the 4-year period 2009/10-2013/14 of 267 per annum shown in the same table, which comprised part of the 5-year period used for the DCLG (2014 Base) projections. The Note concludes '*the 2014-based DCLG projections are based on a 5-year trend in which Ipswich experienced atypical low levels of house completions*'. This is not the case. Prior to the draft 2004 Regional Spatial Strategy the annual

¹ National Office of Statistics, Ipswich, Accommodation Type - Households, 2011 (QS402EW) <http://neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=6275137&c=lP1+2DE&d=13&e=7&g=6483293&i=1x1003x1004&m=0&r=0&s=1470837109766&enc=1&dsFamilyId=2570>

² PSCD14

housing target between 1988-2006 was 250 per annum with a total of 4490 over the 18-year period³. Between 1988 and 2001 the achieved completion rate was 220 per annum and between 2001 and 2006 it was 577 per annum. The Regional Spatial Strategy set a target of 770 dwellings per annum. It could be argued that the period 2001 – 2010 was an atypical boom period for Ipswich driven by the Waterfront development and coupled with high levels of migration. Jobs growth of 55 per annum between 2001-2011 has not gone hand-in-hand with housing growth and is completely unsustainable. It should be noted that it was this unsustainable growth that led to the recession.

We note the arguments put forward in The Note why the 5-year national and international migration trends within the DCLG (2014 Base) projections might give an underestimate and the suggestion in the final table for population estimates based on the 10 year period 2005-2015. When looking at the final Table for average annual Net migration flows the Luton Trend (2006-2011) shows a total of 404 for internal and immigration whilst the population estimates 2005-2015 show a net total of 197, i.e. a difference of 207 per annum or 4140 over the plan period. Assuming an average of 2.3 people per dwelling this equates to a difference of 1800 dwellings. If this adjustment is made to Luton trend re-based projection it reduces to 8730 over the plan period or 437 dwellings per annum.

International Immigration is driven by jobs and is likely to be affected by BREXIT, which has not been considered in this paper. Much has been made of migration from London to Ipswich that will be driven by a combination of jobs and attractiveness of the commute (back to London). Journey times from Ipswich to London are typically 1 hour 15 minutes whereas places that are further away from London have much faster journey times such as Peterborough (typically around 50 minutes) and Rugby (regularly under 60 mins). These locations will be more attractive for commuters as well as nearer locations with shorter journey times to London than Ipswich.

We share the Inspector's view that the IBC jobs target of 12,500 is a challenging one and we note that this challenging target is better aligned with DCLG projections than Luton Trend. All evidence and recent events, such as Brexit, continue to show the Luton Trend as an unrealistically high scenario. We have seen from the above that re-basing the Luton trend data to 2016 results in a reduction in the forecast of approximately 3000 homes combined with the use of the 2005-2015 migration data results in a further reduction of 1800 homes giving a revised projection of 8730 over the plan period, or 437 dwellings per annum (dpa). The Luton trend projections are out of date and in absence of any later data our view is that the DCLG (2014 Base) projections of approximately 8000 dwellings over the plan period should be adopted i.e. 400 dpa. We suspect that this will still be challenging in view of the Brexit uncertainty and in comparison with the historic figure of 250 dpa.

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13th August 2016

³ Annual Monitoring Report 2004 / 2005



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Ipswich Draft Local Plan Examination Further Comments on Ipswich Garden Suburb Consultation Matter 5

This document is in response to a letter from the Inspector's Office dated 8th August 2016 inviting comments on:

- IGS Statement of Common Ground (SOCG) between IBC, CBRE, Crest Nicholson and Mersea Homes (1st August 2016)
- Appendix to the above SOCG
- Policy CS10 - IGS Statement on Phasing and health Impact Assessment Issues – August 2016

1. IGS Statement of Common Ground

Section 3 - We disagree that the location of the Ipswich Garden Suburb as an urban extension of Ipswich is soundly based. The road infrastructure in the north of Ipswich is already heavily congested and the IGS is in a poor position relative to the expanding sites of major employment. Without improved road infrastructure the location of the IGS is not soundly based. We have yet to see any proposals to improve the road infrastructure sufficiently to cater for the additional traffic from the development. The IGS is simply in the wrong location, will result in residents mainly having to commute by car to employment sites and will result in a severe impact on an already congested road network. Furthermore, there is a lack of sewage network capacity to Cliff Quay STW to serve the IGS with no solution in sight, despite being promised over three years ago.

Section 4.02 Affordable Housing Bullet point 5

We support the position of Crest Nicholson, CBRE and Mersea Homes that a cap on the % of affordable homes for each phase is necessary and a value should be identified in the policy. We are of the view that affordable homes should be 'pepper potted' throughout the IGS to ensure an integrated community. This view has also been previously expressed by IBC during the creation of the IGS SPD (IGS Master Plan). Without specifying a % there is a risk that large numbers of affordable homes will be concentrated in the latter phases of the development resulting in less integrated communities.

Section 4.03 Land Use Tables

We support Ipswich Borough Council and Crest Nicholson's position in accepting that the land use table included in Policy CS10 should identify the approximate hectareage of individual land uses for the reasons the Council has given in evidence.

Section 4.04 Vehicular Railway Line Crossing

We support the position of IBC and Crest Nicholson in agreeing with the trigger proposed in relation to the vehicular rail crossing between Fonnereau and Henley Gate neighbourhoods and also in relation to the country park.

2. Appendix to the Statement of Common Agreement

Land Use Tables - We agree with the revised wording shown in the Appendix for CS10 and the land use tables

Affordable Homes - We disagree with the revised wording on affordable homes and support the views presented by Crest Nicholson, CBRE and Mersea Homes. The evidence presented

to date does not show 31% affordable homes as being viable and a more realistic figure should be used. Furthermore, as agreed at the Hearings, it should be made clear that the figure is based on the number of dwellings not floor space. We agree with CBRE and Mersea Homes that a maximum cap on affordable homes for any one phase should be specified in the policy and this should be limited to 35%, which corresponds with the assumptions made in the viability study PSCD31. We agree the revised wording proposed by CBRE and Mersea Homes. There is too great a risk that the provision of affordable homes in excess of that indicated by the viability studies, might be at the expense of the infrastructure that is required for a successful development to the detriment of both new IGS residents and existing Ipswich residents.

SPD Introductory Wording - Agreed

Paragraph 8.112 New Paragraph on Affordable Homes - We agree with the comments of Crest Nicholson, CBRE and Mersea Homes and suggest this proposed new paragraph is deleted.

Table 8B Infrastructure

- **Access & Transport** – We agree the revised wording
- **Vehicular Rail Crossing** – We acknowledge the revised wording provides more flexibility but have concerns that the delivery of the crossing will be delayed until much later in the programme than the original wording specified. This is apparent from the Crest Nicholson Planning Application,¹ which suggests the threshold for both the vehicular and pedestrian/cycle bridges be 690 – 750 units on the Henley Gate site (compared with 300 currently specified). This will have negative implications for IGS site-wide integration including access to the Secondary school, District Centre and Country Park as well as impacting on the external road network and the development of personal travel plans. The children will not be able to access the high school easily. Cycling will not be an option as it will be along main roads without cycling facilities. In addition Westerfield Road only has one narrow footpath on one side of the road and Lower Road has none. There will be no bus route to the school without the bridge, so the only way children will safely be able to get to the secondary school is by car. Depending upon dwellings being occupied in Henley Gate, we would like to see the vehicular railway crossing bridges built at least in time for the opening of the secondary school and/or District Centre.
- **Pedestrian/Cycle Rail Crossing** - There is a current consultation by Network Rail seeking to close the current pedestrian/cycle railway line crossing at Westerfield. If this should occur then Crest Nicholson in their Planning Application are proposing the pedestrian/cycle railway line crossing bridge not be built. It is vital that this bridge is built, as it will provide a safe route for pedestrian/cycle crossing to access the Secondary school, Westerfield Station, Country Park and District Centre. Depending upon any dwellings being built on Henley Gate, we would like to see the pedestrian/cycle railway crossing built at least in time for the opening of the secondary school and/or District Centre. There will be far higher traffic volumes without this bridge.
- **Country Park** – We agree with the wording proposed by IBC.
- **Utilities** – The wording of the Table completely fails to recognise the well-known and unresolved strategic sewage infrastructure issues. The potential cost of increasing sewage capacity from the IGS to the Cliff Quay STW both in financial terms and the level of disruption, needs to be fully assessed in determining whether the delivery of the IGS is sustainable. There has never been any consideration of this in the Sustainable Appraisal without which it is unsound.

¹ Paragraph 4.18, Crest Nicholson Planning Application IP16/00608/OUT

3. Policy CS10 - IGS Statement on Phasing and Health Impact Assessment Issues – August 2016

The document correctly states the concerns the NFIG has with a 'multi-start' approach to the development of the IGS and the reasons why a sequential approach is preferred. Our preference is for each of the 3 neighbourhoods to be developed in sequence but we expect each of the neighbourhoods to have multiple development activities taking place during a sequence. This might be due to multiple developers on a site as indicated by CBRE or multiple parallel activities as indicated by Crest Nicholson. We point out that this matter was discussed during the last public examination of the Ipswich Local Plan in 2011, IBC argued for a sequential approach and the Inspector supported that view, which is a key part of the adopted Local Plan. At no time during that examination did IBC or the developers suggest that a sequential development would take longer than 20 years. Certainly no mention was made of a 45-year period.

IBC first changed their position from a sequential IGS development approach to a multi-start approach when the early studies by the IBC Drainage Engineer indicated that for a satisfactory Sustainable Urban Drainage System (SuDS) an IGS site-wide integrated solution was required. However, later studies involving the IGS developers, SCC and IBC changed that view and have resulted in separate stand alone schemes for each of the 3 neighbourhoods. So the original reason for the change of the IBC position is no longer valid.

Housing delivery – The report is wrong to suggest that the expected order of completions will be reduced to 50-75 dwellings per year if sequential phasing is adopted. There is no fundamental construction reason why the sequential neighbourhood approach cannot deliver 150-200 dwellings per year as suggested during the 2011 Hearing of the adopted Local Plan. The construction rate is usually determined by other factors such as the sales rate linked to market confidence, mortgaging finance availability, market capacity /absorption, optimising sales and whether house prices are outstripping construction costs. Multiple developers on a site can improve the sales rate and a similar effect obtained by a single developer using different branding of multiple on-site developments.

Infrastructure delivery – Whilst we understand the infrastructure financing concerns of IBC, as per above there is no reason the build out rate for the 2 approaches cannot be the same.

Affordable Housing - Whilst we understand the concerns of IBC, as per above there is no reason the build out rate for the 2 approaches cannot be the same and hence the timing of affordable housing delivery.

Attracting new business/employment sources - as per above there is no reason the build out rate for the 2 approaches cannot be the same.

Building a sustainable community - as per above there is no reason the build out rate for the 2 approaches cannot be the same. There will be positive advantages to focussing upon a neighbourhood and finishing it early in that there will be a critical mass of residents sooner, the community will be established quicker, residents will not have to live within a building site for as long, each primary school will be developed sooner and the customer base for buses will be more concentrated.

Conclusion – The documents conclusion is flawed. We believe the build out rate can be the same for the sequential and multi-start approaches. The main advantages are by focussing upon a neighbourhood at a time it will be concluded sooner, critical mass communities established earlier including primary schools, residents will not have to live on a building site for as long and the customer base for buses will be more concentrated. However, a key advantage is that future phases can be stalled pending suitable mitigation should the negative impact on traffic congestion and air quality prove to be much higher than the developer forecasts (Note we have consistently provided evidence showing the traffic modelling has used very optimistic and unrealistic assumptions on modal shift and low trip end data). This gives much greater control than the multi-start approach which once started cannot be halted and also provides reassurance to the public.

Health Impact Assessment - Accepted

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Issue 1
20th August 2016



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Ipswich Draft Local Plan Examination Further Comments on Retail Consultation Matter 7

This document is in response to a letter from the Inspector's Office dated 8th August 2016 inviting comments on 3 attachments, namely a Partial Update of the 2013 Appraisal of the Town Centre (by Cushman & Wakefield), Letter by David Ellsmere (Leader of IBC) and IBC Retail Update Note.

The partial update from Cushman & Wakefield is welcomed and better reflects the current situation, which is consistent with our views and concerns on the issues facing the town centre. We believe that only a shared vision that all key parties responsible for the development of Ipswich are committed to, will attract the investment and redevelopment that is desperately required.

The Inspector is aware of the Ipswich Vision document¹ backed by Ipswich Borough Council, Ipswich Central, Suffolk Chamber of Commerce in Greater Ipswich, New Anglia LEP, Suffolk County Council, University Campus Suffolk and Ipswich MP Ben Gummer.

The Vision, is signed by Councillor David Ellesmere, Leader of Ipswich Borough Council, who is also a Board Member of Ipswich Vision². The Vision is also endorsed with the logo of IBC with the strap line:

"We share a drive and determination to turn our Vision into reality."

It then states "This Vision and this Plan will inform the Local Plan as it makes its way through the planning system. It is a clear sign to developers and investors of what all partners in the town, including the local authorities responsible for planning, highways and economic development, want to see done to make our town centre prosper again."

The Vision for Westgate Quarter is "Westgate Street (beyond its junction with Museum Street) should adapt to a more mixed-use, less retail-focused area. Within the new Westgate Quarter – with the New Wolsey Theatre at its heart - the focus should be upon interests serving the needs of the new residential occupiers and existing cultural experiences. This may include new service provision (doctors, dentists, etc.) alongside small-scale complementary retail. Opportunity for open- air theatre and entertainment experiences exists."

We welcome the moves that have already been made in relation to this regarding an open-air theatre etc but remain concerned about the mixed message being given for the future of the site. The Vision seems to conflict with the position in the letter dated 29th July 2016 from Councillor Ellesmere. Specifically he points out the Vision Document has not been approved by the Ipswich Council Executive nor the Council and as a consequence does not have the weight of the Local Plan. He does not clarify what considerations have been made to date by the Council on the Vision Document and what plans there are, if any, to adopt it.

¹ ICD79 Turning Our Town Around – Advancing the Vision to create East Anglia's Waterfront Town

² <http://www.newanglia.co.uk/2015/07/10/major-players-come-together-to-agree-a-vision-for-ipswich/>

Our concern is that this gives mixed messages to developers and investors of what IBC wants and therefore is less likely to result in the economic development that the town centre desperately needs. The apparent back tracking in Councillor Ellesmere's letter, from this Vision, is exactly what we are concerned about.

We note that at present the Westgate quarter is primarily 'out-of-centre' in relation to the Central Shopping Area (CSA), it is dislocated from the CSA and that CS 14 of the draft Local plan proposes to expand the CSA to include it i.e. 'Council intends to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sq m net of additional floorspace to diversify and improve the retail offer.'

We also note from the Cushman & Wakefield update that Ipswich Town Centre Shopping Centre had 22.3% vacant floor space in 2015, double the UK average of 10.2%. We share their concerns that *'Given the fragility of Ipswich Town Centre and the lack of any significant retail development in recent times, we consider that allocating sites through the new Local Plan to accommodate a higher capacity figure would pose a significant threat to the Town Centre's vitality and viability.'*

The development of retail opportunities within the Westgate quarter is not predicated upon extending the Central Shopping Area. We appreciate that by extending the Central Shopping Area to include it will provide greater assurance for any proposed Westgate retail development but this will be at the additional threat posed to the Town Centre.

Our view is:

- The focus of the Local Plan should be upon increasing the attractiveness of the existing central shopping area and reducing the number of vacant unit and floor space.
- The planned additional capacity of 15,000 sq m needs to be reassessed in the light of the latest evidence
- The Central Shopping Area should not be expanded into the Westgate quarter.
- The policies should be aligned with the agreed vision and proposals contained within ICD79 in so far as they are relevant to what should be contained within a Local Plan.

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Northern Fringe Protection Group
Issue1
10th August 2016



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Ipswich Draft Local Plan Examination Further Comments on Transport/Air Quality Consultation Matter 9

This document is in response to a letter from the Inspector's Office dated 8th August 2016 inviting comments on:

- Letter from Barton Willmore of 20 July 2016 (IGS Transport Summary Note) – PSCD33
- A summary of the overview of the processes, methodology and data sources used to produce the NTEM 6.2 planning data set – PSCD37
- NTEM Planning Data Version 6.2 Guidance Note (Dept for Transport) – PSCD34
- Deriving Background Concentrations of NO_x and NO₂ (Air Quality Consultants) – PSCD36

1. Introduction

Whilst we welcome the additional information presented in the above documents and during the Hearings, we wish to make clear that they have failed to clarify the key issues on soundness that we raised in our representation of 22nd June 2016 regarding Stage 2 Matter 9.

The traffic report is still lacking in key information on the underlying assumptions, input data, traffic network assignment and the output results and **has the potential to mislead decision makers including the Inspector**. Specifically:

- Lack of forecast traffic data for Ipswich Borough, which this Local Plan Examination is about.
- Traffic modelling risks are not quantified as recommended by the Department for Transport¹.
- No Uncertainty Log has been included that identifies the sources of error.
- Trip Rate data for Ipswich is still unclear and appears low which will paint an optimistic picture. There has been no explanation given why in 2031 the assumed 0.8 work & business trips per household per day is significantly less than might be expected from the 1.1 average number of jobs per household (see Section 4 below) and this casts doubt on the traffic modelling to match real world conditions and questions the validity of the modelled results.
- No sensitivity analysis has been performed.
- The underlying assumptions on travel mode have not been made clear in the Ipswich Core Strategy Traffic Assessment². They have been made clear in PSCD33 regarding the Crest Nicholson submission but these are unrealistically high as explained below.
- Although the traffic data has been considered over the working week, it has been averaged over the year including school holidays. In Ipswich, school holidays periods result in much less traffic congestion. It also ignores the fact that far less people walk and cycle in winter. Traffic data will therefore underestimate winter traffic volumes considerably.
- No reconciliation of PSCD18 and those made by WSP concerning the CBRE/Mersea Homes traffic Assessment³.

¹ Section 4.7 Department for Transport TAG Unit M1 Principles of Modelling and forecasting January 2014

² Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report, May 2016, PSCD18

³ Paragraph 48, SCC Cabinet Meeting 11th November 2014

Traffic is a key topic for Ipswich residents and businesses whose perception is one of high levels of congestion today and concerns that the high levels of growth planned in the Local Plan will make it much worse. We believe the soundness or otherwise of the draft Local Plan will ultimately rest on the traffic impact and we are concerned that this has not been dealt with effectively in an open and transparent way.

During the hearing we requested the Inspector consider whether it was within his power to request an independent expert verification/validation of the Traffic Assessment and findings, possibly by the Department for Transport. We believe such a verification to be essential if the public are to have any confidence in the Local Plan Examination process.

2. Letter from Barton Willmore of 20 July 2016 (IGS Transport Summary Note) – PSCD33

We are concerned that this Vectos Transport Summary Note (which we will refer to as ‘The Note’) produced on behalf of Crest Nicholson, makes unrealistically high assumptions for modal shift for both the Henley Gate and the entire Ipswich Garden Suburb and as such, paints an unduly optimistic and unachievable picture. The Note has the potential to mislead the Inspector for reasons explained below.

i. For both the Henley Gate and IGS The Note assumes a very high level of modal shift from cars to sustainable forms of transport, namely 20% for work, business and other activities and 30% for travel to the secondary school. This should be compared with Sustrans data shown below from the Vectos Transport Assessment Chart 5.1 and the Travel Smart project held in Ipswich during 2009/2010, which achieved a claimed improvement of approximately 10%. We are unclear how realistic this figure was. Of the 14,000 households approached, approximately 8,000 people chose to take part equating to approximately 25% of the residents in the approached households (note Ipswich has approximately 2.3 people per household). Of those choosing not to take part some declared no interest in changing their travel behaviour. We are concerned that the claimed modal shift of 10% only related to those willing to take part and ignored that part of the population with no interest in changing their behaviour. In other words, the sample consisted of those residents willing to consider the possibility of modal shift. In which case the potential for modal shift of the total population would be much smaller.

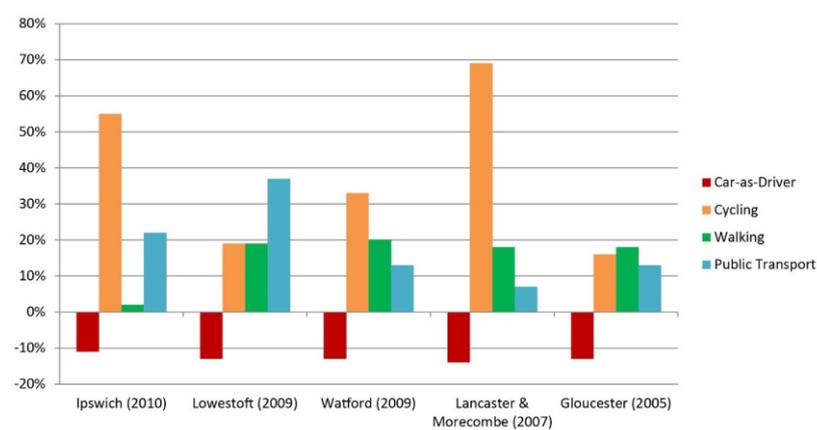


Chart 5.1: The Effect of Personalised Travel Planning, Sustran Projects, Vectos Travel Assessment for Henley Gate Planning Application 16/00608/OUT

The implementation of the Ipswich Travel Smart project took place from April – August 2010 with the behaviour change survey following immediately after this in September – November 2010. There was no assessment of the levels of behavioural change in winter nor on the longevity of such changes after 6 months. The conclusions of the project report (paragraph 6.2.1) state that the “increases in use of sustainable modes and reductions in car use occurred **between at peak and off-peak travel times**”. Figure 5.11 also shows that for those

taking part in the survey, out of all the car journeys undertaken, 30% were driving to work and this only fell to 29% afterwards, i.e. a modal shift of 3.3%. Evidence clearly shows that 10% levels of modal shift were **not** achieved during peak times even in summer months and it is unrealistic to expect higher levels of modal shift in winter peaks especially from people travelling to work by car. We also note that the 2011 Census results for Ipswich showed an increase in car use and a decrease in cycling and walking compared with 2001 as can be seen below.

Journey to Work Mode Share of Ipswich Residents

Mode	2001 Mode Share	2011 Mode Share	Change
Train	0.9%	2.5%	+ 1.6%
Bus, Mini Bus or Coach	9.0%	8.2%	- 0.8%
Motorcycle, Scooter or Moped	1.6%	1.2%	- 0.4%
Driving a Car or Van	46.9%	57.7%	+ 10.8%
Passenger in a Car or Van	6.6%	7.3%	+ 0.7%
Taxi or Minicab	0.5%	0.4%	- 0.1%
Bicycle	9.4%	4.9%	- 4.5%
On foot	24.3%	17.2%	- 7.1%
Other	0.7%	0.5%	- 0.2%

Also Suffolk County Council's traffic consultants WSP clarified during the July Hearings of the examination into the Ipswich draft Local Plan that the May 2016 Ipswich Traffic Report⁴ incorporated a modal shift for 2031 of approximately 6%. It should be noted that Castle Hill, St Margarets and Rushmere Wards were included in the Travel Smart project. Residents in these areas, which border the IGS, who wanted to shift to more sustainable travel modes will probably have already done so. The Note therefore double counts modal shift for these areas.

We note from paragraph 8 that the personalised travel plans assume a general 5% traffic reduction on Valley Road and 10% on Henley Road. These assumptions should be viewed with a degree of suspicion considering the total lack of any long-term data on the effectiveness of such plans. We note that no Travel Plan for the secondary school has been included in the Crest Nicholson Planning Application 16/00608/OUT so we doubt even the 6% modal shift figure will be achieved for journeys to/from the High School.

In summary the modal shift assumptions made by Vectos are unrealistically high, are not supported by any real-life data and result in a misleading traffic impact assessment. As a consequence The Note should be discounted.

ii. The Note is based upon an assumption that there will be "a ban on right turn movements on the northbound and southbound Henley Road approaches"⁵. Although it is claimed it would increase junction capacity it is not a realistic option and gives an optimistic impression of traffic congestion. This proposal has not been approved by either SCC or IBC and in our opinion is completely unacceptable; as it will restrict access to/from existing homes, divert existing traffic to minor roads, some of which are already heavily congested e.g. Park Rd. It will increase rat running considerably and add to congestion at other junctions. The proposal would prevent main road access from the IGS to the A12 (S), the A14, major employment sites such as Whitehouse Industrial Estate and Sproughton Sugar Beet site and to nearby large supermarkets and retail parks. It would also increase the length and times of existing journeys that currently use the right turns which will increase congestion elsewhere.

⁴ Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report, May 2016, WSP/Parsons Brinkerhoff IBC Core Document library PSCD18

⁵ Paragraph 7.26, Crest Transport Assessment, Planning Application 16/00608/OUT. This is not correctly referred to in paragraph 12 of The Note.

There is no modelling of where existing traffic will be dispersed to and the effects of this. This option is not practical and should be dismissed.

- iii. The Note internalises to the IGS that section of the Westerfield Road (B1077) between the Westerfield railway crossing and Valley Road, i.e. the road has been modelled as an internal road to the IGS development and all trips, with the exception of car trips from Henley Gate to the secondary school, ignored for traffic modelling purposes. Westerfield Road will experience a significant increase in traffic from the IGS development and we are concerned this 'internalisation' may give a misleading assessment.
- iv. We note the comment expressed in the Letter that *'the best indicator of how junctions operate is the number of queuing vehicles on each approach'* but would point out that what is important to members of the public is how long it will take them to travel from A-B and is the additional delay incurred due to the growth forecast in the Local Plan acceptable or severe? Although The Note does not aim to model the impact of the Local Plan it aims to provide useful information by focusing upon the traffic impact of the Henley Gate and the entire Ipswich Garden Suburb developments, assuming an overall background traffic growth to 2030. We maintain that it is entirely reasonable to have link delay information for the surrounding roads and Ipswich town centre for the IGS development in a similar way to that presented by Croft Transport Solutions on behalf of CBRE/Mersea Homes⁶. In other words, if Croft Transport Solutions can present the delay data in a format acceptable to the public, we fail to understand why Vectos in The Note and WSP in the Ipswich Local Plan Traffic Assessment cannot?
- v. The pedestrian and cycling enhancements envisaged in paragraph 12 essentially comprise of widening existing pavements to allow shared pedestrian and cycling. The introduction of on-pavement cycling will clearly not improve pedestrian access. In order to do so it will also require the removal of trees and grass verges that are a key part of the neighbourhood and part of the Garden Suburb philosophy. We also note that on 3 out of the 4 corners of Henley Rd with Valley Rd the pavements are not wide enough to allow shared pedestrian/cycling. There are no plans to introduce new dedicated cycle lanes on Henley Rd but the plans would reduce the amount of road space available. This will worsen the experience of on road cycling as will the removal of the ability to turn right from Henley Rd. The proposed so-called pedestrian and cycling enhancements will not deliver the claimed levels of cycling and pedestrians from Henley Gate.
- vi. From the above the junction modelling presented in paragraph 13 gives an over optimistic view of the impact on traffic of both the Henley Gate development and the entire IGS.
- vii. Regarding the Dale Hall Junction, the amount of road space to/from the Henley Road traffic lights for queuing vehicles is approximately 60m, which amounts to approximately 12 cars. We note from paragraph 13 that even with the extremely optimistic modal shift assumptions this is:

- Slightly exceeded for the Henley Gate Development eastbound pm peak (14 vehicles) and westbound am peak (13 vehicles)
- Greatly exceeded for the IGS development eastbound (17 vehicles am peak and 16 pm peak) and westbound (22 vehicles am peak and 21 pm peak)

Clearly, there is insufficient road space between the two sets of traffic lights to support the modelled queue lengths, the impact of this on the modelled results has not been explained and it casts further doubts on the modelled results.

- viii. With regards to the Westerfield Rd/Valley Rd junction (Paragraph 15) we strongly disagree with the figures given for 2030 with background growth but without the Henley Gate or IGS. Namely, for Westerfield Rd (S) of 1 vehicle queuing in the AM peak and 0 vehicles

⁶ Traffic Assessment, Ipswich Borough Planning Application 14/00638

queuing in PM peak and for Westerfield Rd (N) of 1 vehicle queuing in both AM and PM peaks. The current queuing lengths greatly exceed this.

We strongly question the results of the modelling providing in Paragraph 15 for the IGS development. We do not believe that the IGS development of 3,500 homes will result in just 5 and 7 vehicles in the AM Peak on Westerfield Rd at the traffic lights and 5 and 13 vehicles at the PM Peak. We are dumbfounded that the results claim that installing traffic lights and building the IGS will reduce vehicles queuing on Valley Rd Westbound at the AM Peak from 60 to just 10 vehicles. These results illustrate that the modelling is completely flawed.

We also note that there does not appear to be any proposals for dedicated cycle lanes on Westerfield Rd and the plans for shared cycling/pedestrian facilities will worsen pedestrian transit.

Likewise we strongly question the existing queue figures in Paragraph 18 for Tuddenham Rd of just 1 queuing vehicle in both the AM and PM peaks in both directions. The modelled figures are also unbelievably low and demonstrate that the modelling of this junction is substantially flawed.

3. A summary of the overview of the processes, methodology and data sources used to produce the NTEM 6.2 planning data set – PSCD37

This is a helpful background note.

4. NTEM Planning Data Version 6.2 Guidance Note (Dept for Transport) – PSCD34

The above guidance note provides helpful background information but, as it does not contain any data for Ipswich, it is insufficient to allow a verification of the trip end data used in the Traffic Assessment for Ipswich and surrounds⁷. The Department for Transport publishes software called Trip End Model Presentation Program (TEMPro) which can be used to calculate National Trip End Model (NTEM) forecasts for a number of zones within the UK, including Ipswich. The TEMPro software is used for transport modelling and planning purposes.

We note from the above document⁸ that the NTEM planning data version 6.2 is based on very old data, namely the 2001 census and the 2008 based population and household projections. The Ipswich trajectories for dwellings that are used in the model are based on the IBC AMR (Annual Monitoring Report) 2009/10⁹. NTEM 6.2 trip end forecasts have now been superseded by NTEM 7.0 and the associated Trip End Model Presentation Program software by TEMPRO 7.0. Both are based on ONS 2012 data and the 2011 National Travel Survey for mode of travel. According to the Government website¹⁰ they were first published on 7th May 2013 and last updated on 28th July 2016. It needs to be clarified whether the latest NTEM 7.0 data was available during the recent ITAMS modelling and if so why it wasn't used? As we have previously noted the 2011 Census showed an increase in car use and a decrease in cycling and walking compared with 2001. The baseline used for the modelling appears to be wrong.

We have downloaded the TEMPro software but have not been successful in executing it due to error messages. We are therefore unable to verify the Ipswich NTEM data used in the Traffic Assessment. This is unfortunate as the traffic model outputs are critically dependent on the trip end data used in the modelling, which from a simply 'sanity check' outlined below

⁷ Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report, May 2016 PSCD18

⁸ Paragraph 1.2.1 second bullet point PSCD34

⁹ Appendix C Source of Dwellings Input Assumptions, http://www.ipswich.gov.uk/downloads/ipswich_AMR_2009-10.pdf

¹⁰ <https://www.gov.uk/government/collections/tempro>

seems low. It would have been helpful if the TEMPro output for Ipswich could have been made available to us.

The demand placed on a traffic network is critical for determining how the network will perform. We outlined during the Stage 2 Hearings why we believed the trip end data assumptions for Ipswich in 2031 appeared very low¹¹. Specifically, the total work related trips per household per day for 2031 for commuting and business for all modes of transport amounted to 0.796¹² whereas the average number of jobs per household is approximately 1.1 for Ipswich and surrounding Local Authorities¹³. That is, the 0.796 trip figure used in the modelling assumes 28% less trips originating from a household than the 1.1 jobs might indicate and as such could significantly understate the traffic congestion forecasts. Accepting that a small percentage of people will work from home (3.3 % for Ipswich according to the 2011 Census¹⁴) and some part-time workers may not make as many trips as full-time workers, there is still a wide margin between the two figures. WSP were unable to offer any explanation for this during the Hearings despite advance warning of the issue. This simple 'sanity check' casts doubt on the traffic modelling to match real world conditions and questions the validity of the modelled results.

We also note from Table 5-1 referenced below that the total production trips per household per day amounted to 3.06. The above document (PSCD34) does not contain trip data for Ipswich but a number of study areas. Ipswich is grouped into the 'Wider South East'. We note that the average trips per household shown in Figure 6.21 for the Wider South East for 2031 is approximately 4 per day¹⁵, considerably less than that the 3.06 per day assumed for Ipswich in the traffic modelling. Evidence needs to be provided on the reason for this as it casts further doubt on the trip data being assumed in modelling the Ipswich area.

5. Deriving Background Concentrations of NOx and NO2 (Air Quality Consultants) – PSCD36

No additional comments

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¹¹ pp 6-7, Section 5, NFPG Statement on Stage 2 – Matters and Questions, Question 9.1

¹² Table 5-1 2031 NTEM Trip Rates, Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report, May 2016, PSCD18

¹³ East of England Forecasting Model (2014) ICD13a

¹⁴ NOMIS Table QS701EW <https://www.nomisweb.co.uk/census/2011/qs701ew>

¹⁵ Table 5-1 2031 NTEM Trip Rates, Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report, May 2016, PSCD18