



Save Our Country Spaces (SOCS)

Ipswich Draft Local Plan Examination Statement On STAGE 2 - MATTERS AND QUESTIONS

This document refers to the second part of Stage 2 concerning Matters 5 & 9 -Air Quality- with Transport as Appendix A.

Matter 5 – Ipswich Garden Suburb

Policy CS10 and CS Table 8b

Q5.1 *Having particular regard to the following are the policies and proposals for the Ipswich Garden Suburb(IGS) soundly-based?*

No- SOCS say the proposals currently are Unsound; with the draft SPD and relevant DM policies subject to challenge via this Inquiry.

The context for SOCS' evaluation on soundness is based on revisiting what was discussed and agreed at the Last Core Strategy Inquiry in 2011 where SOCS (and NFPG) gave oral evidence. It is based on the evidence and a “common understanding” SOCS have gained through direct involvement in the IBC Community Development Working Group as well as tracking changes under the Government legislation (NPPF 2012), which SOCS believe have led to the landowner's “premature” planning applications (one from 2014, as yet to be determined after 2 years).

Our opinion is also related to what can be described as our “**Confidence factor**” - i.e. SOCS understanding of the legislation and confidence (or not) in the “Due Process” and under the “Localism” agenda.

In 2011, our understanding regarding IGS was, to quote IBC CEO Russell Williams, that

*“Sustainability is the heart of the **problem**.”*

The key word is “**problem**”.

SOCS agreed with this statement in 2011 and suggest that the situation has not changed, in fact, if anything, the IGS appears less “sustainable” and viable in the current economic climate¹.

The site may be prove at the CS Review to be “unsustainable” for development in the prevailing “state of play”. The public understand this and have wholeheartedly, almost unanimously, repeatedly objected to the IGS proposals for many years though the repeated consultation exercises.

Deliverability and Infrastructure

- The IGS may be “**undeliverable**” with landowners appearing to be unable to deliver a comprehensive and effective complex infrastructure plan delivery and build delivery, in a timely and ordered manner, due to a multitude of issues which are outlined briefly below.

Issues such as;

- Development impacts are potentially unsustainable therefore **non compliant under NPPF “serious” or “significant” “adverse impacts” guidance ; impacts** such as **traffic and air quality adverse impacts** on existing **LAQMA** or potentially on the northern fringe villages, **particularly Tuddenham;** (“serious” or “significant” “adverse impacts” are now more readily quantifiable and established under recent case law on congestion and under Supreme Court and EU legislative rulings)
- Delivery may be compromised subject to “**capacity” issues failure- such as inadequate road networks, inadequate supply of water, or sewage network** infrastructure delivery and related viability options.

¹ At the PINS CS Inquiry in 2011, Arwen Owen of David Lock Associates highlighted the fact that the “economic climate” would determine both the time line and deliverability of the IGS.

- **“Viability” may be questionable**- as there is increasingly less public money for infrastructure which must, “pay for itself” - drainage & flood mitigation-the reliance on the full flood and tidal barrier delivery, **including “over-topping pumps**- open space requirements and mitigation - access constraints and connectivity requirements – (such as the pedestrian and cycle route over the railway to serve the Fonnereau Way and sustainable access to the proposed secondary school, other than road access.)
- **Failure of SCC to updated surveys/traffic appraisals of the “rat runs”- E-W routes, including the radial routes to the northern fringe villages; failure to do scenario modelling in 2011 and subsequently, combined with failure to deliver sustainable transport solutions over time, makes transport an Achilles heel of the IBC Core Strategy, particularly at a time when;**
 1. the funding of bus transport has been reduced by Suffolk County Council by 25%
 2. disabled transport reduced
 3. park and ride has been closed,
 4. rail passenger services from Westerfield halved
 5. safe cycling opportunities adversely impacted², (both in terms of risk from accidents and pollution due to the proposed or likely junctions)

Amir Pakravan MD MFSEM DipSEM(UK&I). Sport & Exercise Medicine Registrar. HEEoE / Public Health Suffolk. Chair, Fighting Inactivity Committee ECOSEP ...

BARRIERS TO CYCLING:EVIDENCE & FACTS

- 75% of cycling injuries in Britain happen **at, or near, a road junction**
- Multi-lane roundabouts can significantly increase risk unless there is a separated cycle track
- It was shown that sidewalks and multi-use trails cause the highest risk, **major roads are more dangerous than minor roads**, and the presence of bicycle facilities
- Over a 5 year period **72% of all recorded cyclist casualties were at, or within 20 metres, of a junction** with 57% of these at a t-junction followed by roundabouts.
- In 77% of cyclist casualties at or near a junction the cyclist has not been culpable, however, in 2 of the 3 recorded fatalities over this period the cyclist was at fault.
- In total driver’s error has been attributed to 68% of all collisions in Suffolk.
- **b) Exposure to air pollution**
- Evidence that exercising in air pollution increases cardiovascular morbidity and mortality probably due to an exercise-induced increase in respiratory uptake, lung deposition and toxicity of inhaled fine and ultra fine particulate matter pollutants.
- Commuting to work by bicycle in London is shown to be associated with increased long-term inhaled dose of fossil fuel-derived black carbon
- Short-term exposures to pollution while cycling in traffic may affect heart rate modulation and function in the hours immediately after cycling.
- Enhanced cognition and memory performance achieved through exercise may be negatively influenced by exercising in an environment with high concentrations of particulate matter.
- Levels of the more noxious air pollutants have been controlled in the UK.
- Ozone is particularly damaging to athletes and reaches its highest concentrations on hot bright days in rural areas (NB Ozone is a problem in the Eastern region).

A little context and history is needed at this point.

- The proposed Growth Point for Ipswich pledge in 1999, to hold traffic to 1999 volumes is a pipe dream long since abandoned -The 2007 promised traffic reduction in The Buchanan Waterfront Study, have not materialised. The Northern route most likely to be adversely impacted from the IGS- Valley Road has been “at capacity” since 2001!

² Appendix A: Suffolk Cycle Strategy: Medical and Public Health Evidence
<http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Cycling/Appendix%20A%20-%20Suffolk%20Cycle%20Strategy%20Medical%20and%20Public%20Health%20Evidence.pdf>

SOCS suggest SCC resource stretched transport policy approach for IBC lacks credibility and calls into question their opinions on the IBC WSP May 2016 Traffic Appraisal and Air Quality report.

- Network Rail's intentions regarding use of Felixstowe line and preferential treatment of dock related traffic needs to be factored in.
 - A Comprehensive development requires flexibility- and "wiggle room"- careful timing and careful phasing- **multi starts should not be given as they were deemed unsustainable under SA work done initially** -especially if the multi start approach is likely to burden the town and overload the northern area which is likely to denigrate into one large building site for decades to come- it also means that all the high grade productive farm land may be decommissioned early with landscape, biodiversity and conservation being compromised necessarily.
 - A comprehensive infrastructure approach must be guaranteed, (e.g. Rail Bridge at 500 homes was discussed) and establishment of the Country Park secured from the outset to be sustainable.
 - **A comprehensive landowner agreement must be secured** - to date there is insufficient evidence of that being agreed or the associated cost agreements secured (Section 106 or CIL)
 - Finally, a recent report by Frank Knights highlights that deliverability is impacted by labour costs and labour availability³. The indigenous workforce was severely reduced from 2008 and is yet to be replaced. So these difficulties must be factored in for deliverability as should the Government's drive for growth and housing to deliver from recession which appears to be failing with poor levels of actual home delivery.
 - If we exit from the EU this could be an issue as could the need for the homes, 45% of which it has been suggested are needed to fulfil migrant needs for homes.
- Traffic and transport – **Unsound (SOCS Sign up to NFPG comments entirely-Appendix A)**

"The only traffic assessment showing the 'before' and forecast 'after' effects of the development of the entire IGS is that submitted by CBRE/Mersea Homes as part of their planning application⁴. (Note that the recent Traffic Assessment discussed under Matter 9 includes the IGS development but does not specifically assess the impact of the development. Furthermore, we have severe misgivings about this latest report and the underlying assumptions particularly on modal shift, as discussed below).

In their response to the IGS planning application⁵ Suffolk County Council endorsed the views of their consultants WSP who stated, *"Even with the lack of information and methodical flaws, the results indicate that the development has a severe impact on the network performance and travel times"*

Other infrastructure and services - Unsound

Air Quality – **Unsound**

B. Air Quality Comments

The Air Quality Report⁶ models air quality for the Ipswich Urban area with the objective of enabling IBC to identify locations where they may be risk of exceedance in 2031.

Report Soundness

³ <https://uk.finance.yahoo.com/news/britains-housing-supply-going-lot-122624625.html>

Britain's housing crisis could get much worse because there aren't enough builders to supply the homes needed to address the country's supply and demand balance, according to a survey conducted by estate agent Knight Frank.

Questioning a number of Britain's biggest housebuilders, the survey found that 73% thought "the cost and availability of labour will have a negative impact on future housing supply." There was also a general concern that a Brexit — Britain voting to leave the EU — will only make the acquisition of skilled builders harder thanks to the "impaired" movement of labour. Many developers were hit hard by the 2008 financial crisis and are still recovering. Since then a lot of skilled labourers have moved away from the sector, resulting in a shortage of workers. An ageing workforce that is hard to replace with younger labourers has only exacerbated the situation, the report says.

⁴ Planning Application IP/14/00638

⁵ This document was incorporated in the SCC response to IP/14/00638 Paragraph 48, Suffolk County Council Cabinet Meeting 11th November 2014 Concerning The Ipswich Northern Fringe

⁶ Air Quality Report 27th May 2016 WSP/Parsons Brinkerhoff IBC Core Document Library PSCD19

- The reports risk assessment has been based on the forecast junction capacity at 2031 as modelled in the Traffic Assessment⁷. We challenge the soundness of the Traffic Assessment above and until these issues are resolved the soundness of the Air Quality report must also be questionable.
- Section 1.1.3 states '*in the time available it has not been possible to undertake air quality modelling of the 2031 future forecast scenario for road traffic reflecting conditions with all Local Plan proposals in place*'. **For soundness this should be done.**
- We note from Fig 3-5C that relates to the vicinity of the IGS development, that there will be junction capacity issues at Henley Road, Westerfield Road and Tuddenham Road with expected high levels of Nox.
- St Matthews, St Helens and St Margarets primary schools all lie within air quality problem areas. Similarly there is a nursery school in Chevallier Street, one of the current AQMAs. We have particular concerns of the impact of poor air quality on young and developing bodies.
- IBC have been planning to move to a single AQM Zone but there is no mention of this in the report
- Some measuring sites have been excluded. These need to be clearly stated since they may distort the results.
- The IBC AQMA paper was due to go to the Executive in October 2015 prior to the Local Plan examination. It was rescheduled for June 2016 but has now been put back to September 2016, i.e. after the examination. This is unacceptable.
- **In view of the health implications and publicity on the subject we would expect air quality to feature strongly in the draft Local Plan but this is not the case and so it is unsound.** Although IBC has an objective to improve air quality it is bundled into an objective with other matters and is poorly defined namely
- **'OBJECTIVE 11: To improve air quality and create a safer, greener more cohesive town.'** The AQ objective is really a 'mother hood statement' with no indicators targets or timescales in the Local Plan⁸ and so will achieve precisely nothing. To become effective and improve soundness it needs to be made **SMART (Specific Measurable Achievable Realistic and Timely)**.
- Fresh and Waste Water and Flooding – **Unsound (Wastewater)**

Crest Nicholson has stated their intention⁹ to do more than planning policy dictates by reducing the existing flooding issues at Lower Road. However a comprehensive long term solution for the entire area must be



⁷ Ipswich Traffic Appraisal Modelling Report, May 2016 WSP/Parsons Brinkerhoff IBC Core Document Library PSCD16

⁸ Section 11, Objective 11 Proposed Submission Core Strategy Review IBC Core Document PSCD14

⁹ Henley Gate (IGS) Community Update June 2016

found which adequately embraces the likely recurrent adverse weather events and flash flood likely with Climate change. Lower Road has flooded 4 times over the last two weeks.¹⁰

Sewage Network (possibly a show stopper with concern expressed from both the Environment Agency and Anglia Water at Inquiry in 2011 and the need established for a joint agency water cycle appraisal) “This has long been recognised as an issue for Ipswich as reported in the 2009 Haven Gateway Study¹¹. Section 6.4. However, wastewater collection and transport of wastewater to the works is seen as a potential issue within the Ipswich area.’ IBC have swept this issue under the carpet and seven years on, despite Anglian Water re-iterating the position¹² in February 2013, we are still awaiting a solution to the North of Ipswich wastewater transport infrastructure. This could undermine the viability of the IGS development if a new pipeline through Ipswich to the Cliff Quay Sewage Treatment Works is required.”

- Landscape and nature conservation – **Unsound** as inadequate appraisal of the heritage and biodiversity value of the area has taken place to date. Inadequate open space allowance seems to be suggested and Red House Area with its heritage and un-designated heritage assess features, TPOs and former historic park status should be considered to full fill this obligation to achieve compliance with IBC policies.
- Realistic delivery during plan period – **Unsound**
- Transport Assessment and mitigation measures.--**Unsound**

Q5.2 Does the Sustainability Appraisal adequately assess the likely effects of the Ipswich Garden Suburb and test it against reasonable alternatives. If you contend the Appraisal is inadequate what further work should be undertaken? **No, we agree with NFPG.**

“We maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough. As an example, the cumulative and synergistic effects of housing and jobs growth, both within and just outside the Borough, on traffic, air quality and climate change assume an optimistic view of 15% modal shift from cars to more sustainable transport options.

Unfortunately the SA still fails to recognise that the delivery of the entire Ipswich Garden Suburb might not be viable and has made no assessment of the sustainability /or not of a multi-site development approach that might have to be halted midway due to negative impacts on the town, including severe traffic congestion and poor air quality.

In our opinion to improve soundness the SA should consider the reasonable alternative of IBC agreeing only partial delivery of the IGS”- like York¹³ where thousands fewer new homes than previously forecast will be built over the next 15 years if a new revised planning blueprint for the city is agreed. The amount of greenfield land earmarked for development – a long running source of contention – has also been halved, while 57ha of land is planned for employment sites; four less than before.

¹⁰ 17th June photo

¹¹ SCD25 Haven Gateway Water Cycle Study Stage 2 November 2009

¹² Sue Bull Anglian Water Northern fringe Community Steering Panel 12th February 2013

¹³ Thousands fewer new homes than previously forecast will be built in York over the next 15 years if a new revised planning blueprint for the city is agreed. Proposals drawn up by York Council after years of political rows show the total amount of land designated for new homes in the city’s long-awaited draft Local Plan will be halved - from 960 hectares (ha) to 480ha. The amount of greenfield land earmarked for development – a long running source of contention – has also been halved, while 57ha of land is planned for employment sites; four less than before.