

Summary of Representations on the Draft Low Emissions Supplementary Planning Document (SPD) and the Council's Response, October 2021

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.'

Comments received as a result of the Public Consultation undertaken on the draft Low Emissions SPD are set out in the schedules below, with the most recent consultation stage on the draft SPD considered first.

Public consultation on the draft Low Emissions SPD 2020-21

Public Consultation under regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) was carried out between 18th November 2020 and 13th January 2021 (a period of eight weeks).

Eleven organisations or individuals commented on the draft Low Emissions SPD:

- Three private individuals;
- Natural England;
- Historic England;
- Suffolk County Council;
- Suffolk Police
- British Horse Society
- Northern Fringe Protection Group;
- Save our Country Spaces; and
- West Suffolk Clinical Commissioning Group (CCG), Ipswich & East Suffolk CCG, and North East Essex CCG.

The comments are reproduced below, and the Council's response provided to those points directly relating to the Low Emissions SPD. The commentary also indicates where the SPD has been revised to respond to comments as appropriate. Respondents are thanked for their input into the SPD.

Respondent	Consultation response received January 2021	IBC Response
Private Individual 1	I have prepared the attached comments in response to the current Draft Low Emissions SPD. I'd be grateful if you would consider amending the draft SPD to highlight the potential contribution which the two items highlighted in my comments can make to air quality improvement in the IP-One area (and in the area immediately outside it). I'd be grateful also, if you would share my	The SPD is designed to support the implementation of Local Plan policies to manage and direct new development. The SPD does not have a role in 'retro-fitting' infrastructure to existing neighbourhoods.

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	<p>comments with any of your colleagues in other relevant departments - Sustainability, Parking, Transport and Streets and Environmental Health. The issue of on-street electric vehicle charging in residential streets immediately outside the town centre, is one which requires urgent attention. It has the potential to improve the general quality of life for all of us, as well as air quality in the IP-One area.</p> <p>1 On-street Electric Vehicle charging and air quality</p> <ul style="list-style-type: none"> • Those of us who live in or close to the IP-One area can walk or cycle to the town centre without driving or using public transport. • Our homes tend to have poorer air quality than those in outlying areas. • Our walking and cycling routes to and from the town centre often take us through the areas identified in the Draft Low Emissions SPD as Air Quality Management Areas. • Many of us have no off-street parking and in most of these areas, on-street parking is controlled and managed by Ipswich Borough Council through its well-established provision of Residents' Parking Zones for which residents pay an annual fee. • Without off-street parking, it is not possible to charge electric vehicles from home. Nevertheless, residents in these areas should be encouraged to switch to EVs, which will have a direct positive impact on air quality. • Whilst the provision of EV charging points on IBC car parks is useful for those driving into town from outside, it is not what those living within walking distance of the town centre need. Perversely, I have no choice but to drive my EV from our local RPZ into the town centre for the sole purpose of charging it. Whilst that has minimal direct impact on air quality, it has the capacity to increase congestion and takes up a space which ought to be available for people from further afield. • The lack of on-street charging points acts therefore as a severe disincentive to those living close to the IP-One area who might otherwise consider abandoning their petrol or diesel cars. 	<p>However, the importance of EV charging infrastructure being provided to support the transition to zero carbon and better air quality is recognised. It is a responsibility of Suffolk County Council as Highway Authority to provide on-street charging facilities for use by the public. IBC continues to ask Suffolk County Council to make such provision. Currently SCC's policy is not to commit to it because of uncertainties about the technology.</p> <p>https://www.suffolk.gov.uk/roads-and-transport/transport-planning/electric-vehicle-charging-policy/ Therefore, on-street provision to existing residential areas is not a measure that can be included in the SPD other than through new developments.</p> <p>There are alternative means through which residents can aim to influence SCC to install on street charging infrastructure. For example, residents can express an interest in on-street charging through this SCC web page: https://www.suffolk.gov.uk/roads-and-transport/transport-planning/electric-vehicle-charging-policy/</p> <p>IBC can also explore the possibility of direct provision on the Council's own land. The IBC Air Quality Action</p>

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	<p>The obvious solution (but one which Suffolk County Council as highway authority seems reluctant to engage with) is the provision of on-street charging.</p> <ul style="list-style-type: none"> • IBC has already identified the areas where it is appropriate for those of us living close to the town centre, to park – in the RPZs. Although SCC is the highway authority, the RPZs are designated and managed by IBC. • IBC should be working in partnership with SCC to provide on-street electric vehicle charging. One charging post serving two spaces in each RPZ should be sufficient initially. Over time, the number of charging points should be increased to encourage EV take-up and to stay ahead of (rather than simply responding to) demand. • In a recent exchange with the Highway Authority, I was told that: “As energy-storing solutions for electric vehicles is a rapidly changing technological area, there is significant potential for installed new infrastructure to soon become outdated and potentially redundant.” • On-street charging is provided by local authorities in many other areas of the country. It is simply unacceptable, perverse even, for Suffolk, with its stated ambition to be the Greenest Council, to actively resist in this way, such a clear and obvious need. • I was also told by SCC’s representative, that: “Apart from short-term parking locations where vehicles would be expected to come and go regularly, it is also not appropriate for specific sections of the highway to be reserved for specific individuals (for vehicle charging or otherwise).” • ... which was beside the point, the point being that in Ipswich, specific sections of the highway have already been reserved – not for ‘specific individuals’, but for specific groups of residents - those living in the immediate vicinity. All that is required is for charging points to be installed within the RPZs. • The provision of on-street charging for electric vehicles in residential areas around the edge of the town centre will assist in the Borough’s efforts to improve air quality within the IP-One area. It should be an important 	<p>Plan includes Measure 12 to ‘Assist the Council’s Car Parking Services in the development of their policies and strategies to promote clean travel and improved air quality.’ EV charging is already available at Crown Street car park and further opportunities for provision in existing car parks are being considered, which could offer a greater range of locations.</p> <p>Tackling air quality needs coordinated action by multiple agencies. Therefore, the SPD has been amended to add a section briefly outlining organisations’ responsibilities, and the range of measures being pursued to address it. New paragraphs have been added to section 2 (2.4 to 2.6).</p>

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	<p>element in the Borough's Low Emissions SPD (and in its wider responsibilities to respond to the global climate emergency). The Borough should engage with the highway authority to address this issue immediately."</p>	
Private Individual 1	<p>2. Bus and private hire vehicle emissions</p> <ul style="list-style-type: none"> • The existing fleet of buses operating around the IP-One area includes several ageing vehicles which produce appalling levels of noxious emissions. • The same issue applies with respect to many of the taxis and other private hire vehicles operating in the IP-One area. • There is little point in trying to encourage people to leave their private cars at home and use public transport instead, if the buses which frequently back up in the narrow streets around the town centre, are emitting plumes of harmful gases. • The draft SPD seeks to identify means by which harmful vehicle emissions can be reduced and air quality improved. The document is largely silent on the quality of the public transport fleet and private hire vehicles. • The SPD should address the issue of emissions from buses and private hire vehicles as a matter of priority. It should identify realistic means by which the quality of the local bus fleet and private hire vehicles can be monitored and improved. It should include: incentives for improvement; a rigorous vehicle emissions testing regime; and sanctions against operators, in the event that rapid improvement is not achieved and for repeat offences. The SPD should set a target programme for the replacement of all petrol or diesel buses and private hire vehicles with cleaner alternatives, whether electric or hydrogen powered. 	<p>The scope and role of the SPD is to support the implementation of Local Plan policies to manage and direct new development. Therefore, the SPD does not have a role in lobbying bus operators about their vehicle fleet.</p> <p>However, bus emissions are an important focus for improvement. IBC is taking action through the Air Quality Action Plan and its stake in Ipswich Buses. Tackling fleet emissions is priority 2 of the Ipswich Air Quality Action Plan. Action 14 of the AQ Action Plan is to:</p> <p>'Work with Ipswich Buses bus fleet to encourage the renewal of their fleet to cleaner i.e. Euro VI or better and/or low emission, hybrid buses, on certain routes.' This is being progressed through a phased project plan.</p> <p>IBC signed up to a Quality Bus Partnership with SCC, Ipswich Buses and First on 25 May 2020. A new enhanced partnership (EP) is now being formed in Suffolk as a result of the new National Bus Strategy which could lead to government funding opportunities for retro-fitting Euro VI or newer low or zero emission buses.</p>

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		Text has been added to section 2 of the SPD to refer to some of the broader (non-land use planning) range of measures being undertaken (2.4 – 2.6).
Private Individual 2	There is an urgent need to extend the provision of electric vehicle charging points, both in public ‘gathering’ places such as supermarkets, major employers, doctor surgeries, sports centres and so on. Likewise there is much to do not only regarding new build but also in rolling out points to serve those residential areas without a front drive and therefore unable to install their ‘own’ kit. So...more on-street points must be provided, utilising street lights or whatever.	Please see first response to private individual 1. The SCC Suffolk Guidance for Parking on public electrical charging points is actively being pursued where developers on relevant planning applications do not conform to requirements, so that over time, there will be a greater supply of electric charging points as new commercial development comes forward.
Private Individual 2	Cycling in Ipswich is still a fairly unpredictable and occasionally hazardous experience. We need more cycle lanes and imaginative routes across and around town and more effective road maintenance. I know that’s the responsibility of the HA but you can talk to them! Hitting a pothole in a car is tiresome; on a bike it’s potentially life-threatening.	The provision and maintenance of cycle routes are Highway Authority (Suffolk County Council) responsibilities. However, securing provision and maintenance associated with new developments is a function of the local planning authority. It is currently required through adopted Local Plan policies CS17 and DM17 (emerging Local Plan Policies CS17 and DM21). The wording of mitigation measures in Appendix 2 of the SPD has been strengthened to refer explicitly to maintenance as well as provision. The Low Emissions SPD can influence cycle route provision and design in new

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		<p>developments, in addition to securing planning obligation funding for ongoing maintenance of routes associated with new developments. Such funds cannot be used as a general 'pot' as they must meet requirements including being directly related to the development.</p> <p>IBC also has an adopted Cycling Strategy SPD 2016. This also looked at the quality of existing routes and recommended specific locations for improvement. The safety of routes for cyclists is of fundamental importance and is a key consideration outlined through the Cycling Strategy SPD.</p> <p>IBC and SCC are working together on the Local Cycling and Walking Infrastructure Plan to bid for funds to deliver practical enhancements to existing routes. The Plan is cross referred to in Appendix 2/footnote 19. The Ipswich Local Cycling and Walking Infrastructure Plan is now available in draft:</p> <p>https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/scc_lcwip_v9_2020.pdf and will have an important role as a vehicle for bidding for national funding for infrastructure provision. For clarity, reference to route maintenance has been added to Table 4 Examples of Type 1 Mitigation.</p>

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Private Individual 2	<p>Outside the parks (most of which are wonderful) Ipswich is not a very green town and the role of trees both aesthetically and to combat emissions seems under-utilised. The refurbishment of the Cornhill is a good example where the new landscape is depressingly hard and unrelieved by any greenery. Likewise the Waterfront and other development areas lack any 'life'.</p>	<p>The SPD encourages tree planting, in support of Local Plan policy DM10 which sets a target for increasing canopy cover across the town, protects trees on development sites, and requires 2 for 1 replacement of any trees lost through development. For example, the SPD identifies as a mitigation measure: 'Using, where appropriate, green infrastructure or planting to absorb dust and other pollutants.'</p> <p>The adopted Local Plan specifically encourages street trees (e.g. paragraph 9.197 to policy DM31) and the Council has promoted them through new developments (e.g. through the Ipswich Garden Suburb SPD).</p> <p>In July 2021, the Government revised the National Planning Policy Framework to explicitly require street trees (NPPF Para. 131): 'Planning policies and decisions should ensure that new streets are tree-lined ...'</p> <p>The SPD has been revised to make explicit mention of street tree provision on development sites through Appendix 2/Table 4.</p> <p>In addition, fifteen Ipswich projects have been approved for Town Deal funding from the Government. This includes Ipswich Oasis (Town Centre Greening) which has been allocated £0.6million to</p>

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		provide more trees in both the town centre and the Waterfront areas.
Private Individual 3	5.11 800m is not an acceptable walking distance for older people or those carrying a heavy load.	Not everybody will be able to walk such a distance, or to do so on every occasion. However, 800m is a standard distance prescribed by engineers, indicating a ten-minute walk at average walking speeds (around 3 miles per hour) and is used across local authorities.
Private Individual 3	5.14 The 2011 Census is too old a source of information on transport. Living on the by-pass, I am aware of an enormous increase in car movements and even in my slip road, the number of gardens which have been paved in order to accommodate 2 or 3 cars per house.	More up to date data on travel is used where available and appropriate (such as travel to work surveys), but Census data provides a baseline for statistics such as levels of vehicle ownership per household.
Private Individual 3	5.22 Given the ageing population, charging points for disabled buggies needs addressing as well as for E-bikes. It goes without saying that charging points for cars currently parked in small streets will be required urgently, given the Government's recent announcement to phase out petrol vehicles by 2030. Has any consideration been given to how charging points in houses with driveways can be encouraged since this will run off the householder's electricity supply? Those living in small roads with terraced houses and no driveways will need access to a publicly supplied system.	The scope and role of the SPD is to support the implementation of Local Plan policies to manage and direct new development. Therefore, the SPD does not have a role in 'retro-fitting' infrastructure to existing neighbourhoods. However, this can be pursued through other initiatives. A section has been added to the SPD making the connection between different areas of responsibility and action (new paragraphs in section 2). For homes with driveways, as the transition to electric vehicles takes place, residents will need to install the charging infrastructure needed. The RAC reports that the typical cost of a home charge point is around £800.

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		<p>There is an Electric Vehicle Homecharge Scheme (EVHS) which offers a grant that provides a 75% contribution to the cost of one charge point and its installation. A grant cap is set at £350 per installation.</p> <p>https://www.gov.uk/government/publications/customer-guidance-electric-vehicle-homecharge-scheme/electric-vehicle-homecharge-scheme-guidance-for-customers</p> <p>Designing homes to accommodate space for (charging) mobility buggies is outside the scope of this SPD. Nevertheless, the advice in para. 5.28 on e-bike charging provision may also help to address other battery charging needs.</p>
Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England does not consider that this Draft Low Emissions SPD poses any likely risk or opportunity in relation to our statutory purpose. We have previously commented at screening stage and concluded that it would not need an HRA or SEA.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document. If you disagree with our assessment of this</p>	<p>The comments are noted and no changes are proposed to the document.</p>

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	<p>proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	
Historic England	<p>Thank you for consulting Historic England on the Low Emissions Supplementary Planning Document for Ipswich. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.</p> <p>We have reviewed the Low Emissions Supplementary Planning Document. As a general comment, Historic England welcomes the proposed measures to improve the Air Quality in the Borough. Air quality can affect the historic environment in a number of ways including affecting the masonry of buildings, or the general setting in the broadest sense of heritage assets (e.g. reduction in noise and vibration and improvement in air quality through reduction in traffic etc.</p> <p>There are currently no references in the document to heritage and the historic environment. Whilst this is clearly not the main focus of the document, there is the opportunity to make a brief reference in the SPD to the benefits of lower emissions for the historic environment and also some of the potential implications of policy considerations in this area. For example, there are occasions when certain historic environment considerations may outweigh/conflict with air quality considerations. The use of modern construction techniques on a listed building, for example, may detrimentally affect existing historic fabric elsewhere in the building therefore risking damage to the heritage asset contrary to the objective of the NPPF to</p>	<p>The SPD provides guidance to support the implementation of Local Plan policies and does not contain policy itself. Nevertheless, it is important to acknowledge in the SPD that there could be situations in which AQ objectives and heritage considerations potentially conflict. Wording has been added to the end of section 4 (4.33) of the SPD to reflect Historic England's comments.</p>

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	<p>conserve and enhance the historic environment. We raise concerns that this type of construction may not be appropriate for certain developments affecting the historic environment. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. Any policy should seek to limit and mitigate any such cost to the historic environment.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/> to be helpful in understanding these special considerations.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>	

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Suffolk County Council	<p>Health and Wellbeing</p> <p>SCC welcome the references to health and wellbeing within this document and support the steps taken by the Borough Council to address air quality.</p> <p>Poor air quality can lead to a variety of public health concerns, such as respiratory issues including asthma, and long-term effects such as cardio-vascular disease, chronic obstructive pulmonary disease (COPD), lung cancer and stroke. These long-term effects can lead to a reduced life expectancy, and an increase in hospital admissions. The reference to health impacts in paragraph 1.1 is welcome.</p> <p>Car parking restrictions alongside support for cycle parking and other infrastructure will help to achieve aims of a greater level of active travel shared by both the Borough and County councils. This can help to improve physical fitness and reduce obesity, thus easing the strain on health services, as well as the potential improvements to mental health and wellbeing that arise with access to the outdoors.</p>	<p>Comments noted – as stated, the health impacts of poor air quality are acknowledged in paragraph 1.1. Reference to the public health benefits of active travel has been added to paragraph 1.6.</p>
Suffolk County Council	<p>Transport - Air Quality</p> <p>In regard to paragraph 4.29, it is recommended that more detailed information is included as to how “good design” of a development and buildings can mitigate poor air quality and emissions.</p>	<p>The importance of good design is referenced throughout the SPD, and specific measures are listed in paragraph 4.13. However, reference has been added to the benefits of good design and to sources of guidance to help achieve it (4.29).</p> <p>In the context of paragraph 4.32, transport mitigation measures set out through the ISPA Transport Mitigation Strategy have been added.</p>
Suffolk County Council	<p>Parking Guidance - On-street parking demand surveys may be recommended to assess the risks of unmet demand for car parking and mitigation for this needs to be</p>	<p>Reference has been added to demand for on-street parking in the context of considering applications for car free development (section 5). It</p>

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	<p>provided.</p> <p>Residential parking: The table within paragraph 5.18 of the SPD is in contradiction to the table found on p52 of the adopted document Suffolk Guidance for Parking (2019)¹, where the minimum spaces is in some instances higher than the maximum spaces in this SPD. It is acknowledged that urban areas will have a greater level of public transport, and more opportunities for walking and cycling, as services and facilities are in closer proximities, and so the demand for car ownership is likely to be lower. It is suggested that this SPD could include a brief explanation as to why the residential parking numbers differ to those laid out in the SGP in paragraph 5.16, in a similar way to how it has been stated regarding visitor parking in paragraph 5.17.</p>	<p>includes taking into account residents' parking zones in determining applications for car-free housing development.</p> <p>Text to explain why the residential parking numbers differ from those laid out in the Suffolk Guidance for Parking has been added to paragraph 5.16.</p> <p>The Council is taking a firm position in relation to problem parking. Ipswich Borough Council's Executive have authorised a new policy that means motorists who regularly fail to pay fixed penalty notices can have their vehicle clamped and towed to a compound in Colchester. In addition, Councillors also agreed to request powers from Suffolk County Council to remove cars parked on the highway that cause an obstruction.</p>
Suffolk County Council	<p>This table also states three times that "Car free development is acceptable", however more nuance is required here, as there as some parking may be appropriate, depending on the circumstances. "Car free development may be acceptable" would be the preferred wording. It would then also be helpful if the SPD also set out the circumstance that would make car free development acceptable. SCC propose the criteria below as a starting point and would be willing to discuss this further.</p> <p>Car free parking may be supported where:</p> <p>a) the site has good access to frequent bus services, pedestrian and cycle routes; and</p> <p>b) for residential developments, the site is</p>	<p>Table 5.1/paragraph 5.18 has been amended to state 'may be' acceptable, and explanation has been added to the paragraph which follows it. However, the justification for this approach is made in the paragraphs before Table 5.1 and is based precisely on the proximity of services and facilities, accessibility and sustainable transport options. Therefore, it is not appropriate to add criteria for car free</p>

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	<p>within close proximity to shops and other day-to-day local services; and c) reduced car ownership/use can be enforced by means of a planning condition or obligation, on-street controls, or other methods to ensure that increased on-street parking pressure will not occur.’</p>	<p>development. However, paragraph 5.20 replaces reference to distance from the car parking core with the distances from public transport hubs as considerations in applying the guidelines.</p>
Suffolk County Council	<p>While 5.19 does acknowledge that, “because the shape of the IP-One area means accessibility varies slightly across the area”, however some clarity is requested for what the thresholds of “distance from the Central Car Parking Core and public transport accessibility will also be considered” would be.</p> <p>The potential issue with “communal provision” for 3-bed flats and houses, is that potentially the occupants of any given two dwellings may expect to keep two vehicles each, hoping the other will only want one. The result can be real demand for a fourth space. It is recommended that it would be better to be clear on the numbers allocated to each dwelling and then, if one has a surplus, they can rent it to their neighbour at a local level. Alternatively, permits can be used, and the market can then control demand. The cost of parking space needs to be clearer, which would also help car clubs.</p>	<p>The definition has been amended to refer to distance contours from public transport hubs rather than the Central Car Parking Core, as public transport accessibility is the more relevant consideration for car free development.</p> <p>Reference to communal provision has been deleted from Table 5.1 and the maximum standard for 3 bed dwellings increased to 2 (which is the minimum elsewhere in Suffolk).</p>
Suffolk County Council	<p>Cycle parking: The requirement of secure cycle parking provisions that are conveniently located, in paragraph 5.20, is welcome. Residential bike storage that is safe and secure is likely to lead to an uptake of cycling, as people would feel more comfortable investing in bicycles and leaving it in a protected location where it is less at risk of theft or vandalism. SCC would suggest that cycle parking should be increased above what is proposed for larger properties displayed in the table in paragraph 5.18. SCC welcomes the idea that there is no</p>	<p>The cycle parking guidance for larger properties has been amended to increase the provision on the basis of expected occupancy (for example a family of four occupying a 3-bedroom house).</p>

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	<p>maximum for cycle parking in dwellings of any size.</p> <p>Specific mention of cycle parking provisions for visitors is welcome.</p> <p>For the final bullet point of paragraph 5.21 states that a shed can be a cycle storage provision. However, this point should set out clearly what constitutes a shed: whether an average flat-pack-style garden shed is acceptable, or if a specifically designed cycle storage shed is required, and how it can be made secure.</p> <p>For example, inspiration could be sought from the Cambridge City Council Cycle Parking Guide for Residential Developments 20102, in which paragraph 4.1.9 states: 'Domestic wooden sheds are not recommended unless they have walls of tongue and groove construction at least 18mm thick. Mortice locks and not padlocks should secure doors.' It is suggested that Ipswich Borough Council could liaise with Suffolk Police for specific guidance and specifications on the most secure options. Obviously as Cambridge has a very high population of cyclists, it is very important for the council to have created a very detailed plan, for the safety and security for cycling and bike storage provisions.</p>	<p>Advice from Suffolk Police regarding the safety requirements for cycle sheds has been added to section 5 (5.26).</p>
Suffolk County Council	<p>Car Clubs:</p> <p>It is noted that car club provision is expected "depending on scale of scheme". SCC would like to see car clubs more heavily promoted, as it addresses the suppressed demand for parking and car club vehicles are more likely to be electric sooner with air quality benefits. It would be helpful if the guidance could demonstrate how car clubs will be delivered. This could be achieved by identifying an indicative threshold at which a development could deliver a car club. the key aspects of Car Clubs are having good public access (liabilities) and providing the charging system. At present, SCC has no specific</p>	<p>Text has been added to section 5 to explain the circumstances in which car clubs may be expected and how they would be provided.</p>

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	commitments to the provision of on-street charging points.	
Suffolk County Council	General Appendix 1, Table 2: The building use classifications have changed, as of September 2020, and so it is suggested that this document should be updated with new land use class.	The Use Classes order references in Appendix 1 table 2 have been updated.
Suffolk Police	May I request that the following broad themes are taken into consideration when reviewing this document: <ul style="list-style-type: none"> • Some actively habitable rooms are left at the front of any property to ensure natural surveillance over the street/public areas. • Green infrastructure does not impede surveillance, either natural or formal such as CCTV. • Car parking is provided within sight of the owners property to allow natural surveillance. • Cycle storage standards for dwellings should include the need for a Solid Secure anchor point fixed to a suitable substrate, with a robust shed with no windows. Also that the shed should be stored within a secure garden with a gate capable of being locked from both sides and located close to the house. 	Reference to maintaining natural surveillance 'where possible' has been added in a new paragraph following the bullet list in 4.13. It might not always be possible to achieve health objectives and security objectives, but applicants are encouraged to consider whether and how both objectives may be achieved. The design of parking is addressed through the Suffolk Guidance for Parking which includes in its checklist for designers: 'Can parking spaces be viewed from properties?' and 'Have the likely effects of parking on street safety, fear of crime, personal security, and the potential for vehicle damage been considered?' The SPD refers to the Suffolk Guide. Advice on cycle shed security has been added to the part of section 5 addressing cycle storage.
British Horse Society	The British Horse Society is an equestrian Charity which represents the 3 million horse riders in the UK. Nationally equestrians have just 22% of the rights of way network. In Suffolk, they have just 18% of the rights of way network, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development	The Local Plan would be the more appropriate document through which to explicitly broaden any definition of active travel. Amendments to the Ipswich Local Plan would need to be made through the Local Plan review process

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	<p>within the County. It is therefore important that these public rights are protected. We hope that Ipswich Borough will take the opportunity to address the disjointed nature of Suffolk's Right of Way network in the current consultations, and ask that the Plan should include:</p> <p>a. Recognition of equestrians as vulnerable road users. Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that "We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders."</p> <p>We therefore ask that the Ipswich Draft Low Emissions Supplementary Planning Document identifies equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists.</p> <p>b. Inclusion of equestrians in the Ipswich Draft Low Emissions Supplementary Planning Document. The term 'Active Travel' applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use. It is now acknowledged that horse-riding is as much an 'active travel' mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that "horse riders...ought to be thought about in the context of active travel as well." This was endorsed by Michael Ellis, Minister of State for Transport, who</p>	<p>rather than through a guidance document such as the Low Emissions SPD. The term active travel is used only once in the SPD in text added to section 1 following the public consultation, to more fully explain the health benefits.</p> <p>The definition of 'active travel' used by Public Health England ('Working Together to Promote Active Travel - A briefing for local authorities') and Suffolk County Council as Highways Authority ('Active travel improvements' web page) refers only to cycling and walking. For example, 'walking or cycling as an alternative to motorised transport ... for the purpose of making everyday journeys.' (PHE 2016.)</p> <p>Given the built-up nature of Ipswich Borough, it is less likely that horse riding will make a significant contribution to active travel than may be possible in rural districts.</p> <p>The Suffolk Green Access Strategy 2020-2030 does recognise the need for provision for horse riders and is an important document through which to address the needs and safety of horse riders. The comments received will be passed to the Public Rights of Way Team at Suffolk County Council.</p>

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	<p>confirmed that “Active travel includes horse riders and bridle paths – this debate includes them.” Cambridgeshire is demonstrating good practice, James Palmer, Cambridgeshire and Peterborough Mayor has stated in a current transport consultation: ‘Active Travel – cycling, Walking and Horse Riding Promoting active and sustainable transport like walking, cycling and horse riding are key objectives at a national, regional and local level.’ He has also stated that Greenways are an ‘... off road route for walking, cycling and horse riding.’ The recently adopted Joint Cambridgeshire and Peterborough Local Transport Plan defines Active Travel as: ‘Active Travel: Physically active modes such as walking, cycling or horse riding.’ We would ask that all Active Travel provision must therefore be embedded in new transport projects in the same way for all modes. We therefore suggest that horse-riding should be included within the emerging Draft Low Emissions Supplementary Planning Document and would welcome the opportunity to contribute the development of this document.</p>	<p>Both the adopted and emerging Local Plans refer to protecting the public rights of way network, which would include bridleways, without specifying which transport modes may use them. The emerging Local Plan states: ‘The Public Rights of Way network is more than just a means of reducing vehicular traffic. In addition to connecting areas and providing opportunities for physical recreation and social interaction, it provides vital access to services, facilities and the natural environment. In this sense it is a major recreational resource, economic asset and means of promoting mental and physical health.’</p>
British Horse Society	<p>c. Equestrians to be included in any shared-use routes, wherever possible. In order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible. Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS are doing in partnership with Cycling UK in the current ‘Be Nice, Say Hi!’ campaign and with Sustrans in their ‘Paths</p>	<p>Please see the response provided above. Given the built-up nature of the Borough, horses are less likely to play a significant role in active travel choices. The Local Plan and the Suffolk Green Access Strategy 2020-2030 are considered the more relevant strategies through which to address their needs.</p>

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	<p>for Everyone' initiative. The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.)</p>	
British Horse Society	<p>d. Reference to Public Rights of Way Standards and Guidance for Development A good example of this is 'Equestrians in Hampshire – a reference guide for Transport, Planners, Developers and other decision makers' document written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county. We would like to work with Ipswich Borough Council to create a similar document specifically for Suffolk too so that the proposed new bridleways, when implemented, will restore connectivity within the wider RoW network in a way that will benefit all users, including equestrians. We would urge Ipswich Borough Council to incorporate the principles set out in this guidance into their planning policy: most particularly, that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development.</p>	<p>Please see the response provided above. The comments are more relevant to Suffolk County Council as Highway Authority.</p>
British Horse Society	<p>Type 1 Mitigation for Small, Medium and Large Proposals – development should incorporate as many types of mitigation as are appropriate and deliverable This should be reworded to include equestrians: Measures to support accessibility and non-motorised users' infrastructure. Measures to support and improve non-motorised users' infrastructure (e.g. encourage links to existing Rights of Way (ROW) in order to improve opportunities for walking/cycling/equestrians). 8.185 and Policy CS16 This should include equestrians and be worded as below: The reasoned justification explains that as</p>	<p>Please see the response provided above – Local Plan policies cannot be amended through the SPD consultation. Reference to 'non-motorised users' has been added to bullet 2 of Table 4 – Type 1 Mitigation.</p>

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	<p>the Borough grows, it is essential to protect, enhance and extend the network of open spaces, ecological networks, canopy cover, green corridors, and sports and recreation facilities. This is important in order to allow people access to green space and nature an opportunity for non-motorised user routes including walking, cycling and horse riding and the interrelated benefits of improved biodiversity, health and fitness, and better air quality. Policy DM10 and DM33 Again, this should include equestrians and be worded as below:</p> <p>The Protection of Trees and Hedgerows and delivery of Green Corridors for walkers, cyclists and equestrians are seen as important methods of enhancing air quality. Policy DM17 Equestrians should be included: Transport and Access in New Developments promotes cycling walking horse riding, safe and convenient access to public transport and the introduction of electric car charging points and car clubs. Para. 5.39 and policy SP15 Equestrians should not be excluded therefore it should be worded as:</p> <p>The extensive Air Quality Management Areas are identified as a key issue, and this is related to the delivery of measures for to support walking, cycling and horse riding.</p>	
Northern Fringe Protection Group	<p>We are disappointed that it has taken so long for IBC to release this consultation following the Call for Ideas in July 2015, and again in June 2017. Unfortunately, this seems to reinforce our longstanding and repeated concerns that insufficient action to tackle the poor air quality in Ipswich is being undertaken by the Council. Decisive action and leadership are required from IBC to prevent continued early deaths of Ipswich residents and increased levels of respiratory diseases of those people that live, walk or cycle in the AQMA areas.</p> <p>1. We note that the Council is currently in the process of updating the Ipswich Local Plan up to 2036, which is scheduled for adoption in 2021 and in December 2020 was subject to public examination by the Planning Inspectorate. The draft Low Emissions Strategy SPD clearly will need to take account of the Planning Inspector's comments and recommendations on relevant</p>	<p>The Council attaches a high priority to tackling air pollution and is taking a range of actions, including through the preparation of this SPD and the implementation of the Air Quality Action Plan.</p> <p>Until the emerging Local Plan reaches adoption, the 2017 Ipswich Local Plan remains in place as the policy to which the SPD relates. If at such time as the emerging Local Plan is adopted the SPD will still be in place, any reviews</p>

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	<p>issues in relation to modal shift, air quality and car parking, including new infrastructure and monitoring and targeting requirements before it can be adopted. From the Inspector's comments, we believe these are likely to have a material effect on the draft Low Emissions Strategy and that a further short consultation on the required changes will be necessary, hopefully without unduly slowing down its adoption. Not to do so, could render the Low Emission Strategy obsolete almost as soon as it is adopted.</p>	<p>will take place thereafter as necessary.</p>
<p>Northern Fringe Protection Group</p>	<p>2. The SPD does not adequately reflect the need for IBC to achieve compliance with legally binding emission values. The Low Emissions Strategy SPD needs to include a commitment to meet air quality limit values by a specific deadline for it to be sound.</p>	<p>The SPD sets out guidance for planning applicants. The Local Plan is the appropriate document in which to make policy statements. The SPD is not subject to examination for its soundness, as it does not contain policy. Rather it represents an amplification of existing policy.</p> <p>Paragraph 3.3 of the SPD cites NPPF paragraph 186: 'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants.'</p> <p>Wording has been added to the SPD, paragraph 3.3, to state: This SPD sets out how the Council is working to ensure that planning decisions contribute towards such compliance.</p> <p>Modifications have been proposed to the emerging Local Plan policy DM3 supporting text and targets and indicators to set out SMART, quantified targets and the need to contribute</p>

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		<p>towards achieving compliance.</p> <p>Until the emerging Local Plan reaches adoption, the 2017 Ipswich Local Plan remains in place as the policy to which the SPD relates. If at such time as the emerging Local Plan is adopted the SPD will still be in place, any reviews will take place thereafter as necessary.</p>
Northern Fringe Protection Group	<p>3. We believe that IBC should not be permitting new development if it results in any increase in emissions above legally binding limits, after proposed mitigation measures, as this will clearly be detrimental to human health. The SPD should be amended to reflect this.</p>	<p>This is primarily a matter of policy for the Local Plan. Emerging policy DM3, paragraph 9.3.6 states that where an AQA shows that development would cause harm to air quality, planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels.</p> <p>As the SPD currently relates to the 2017 adopted Local Plan, wording has been added to the SPD, paragraph 3.3, to state: This SPD sets out how the Council is working to ensure that planning decisions contribute towards such compliance.</p>
Northern Fringe Protection Group	<p>4. The SPD should specifically reference that Air Quality Assessments for large developments should include an assessment of the impacts on traffic emissions in the early years of the build-out (before reduced emissions from low and/or zero emission vehicles are able to deliver sufficiently improved air quality). Air quality could well be worse in the early years of a long development.</p>	<p>The SPD refers applicants to the IAQM guidance which includes reference to construction vehicles at 6.22 j. Nevertheless, explicit reference has been added to the relevant part (J) of Appendix 4.</p>
Northern Fringe	<p>5. The SPD needs to specifically reference the need to assess the wider impacts on air quality in and around AQMAs, during the</p>	<p>Construction phase traffic is addressed above, although</p>

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Protection Group	construction phase, rather than focus on dust. This should include emissions from delivery and trades vehicles and from associated off-site works such as foul water infrastructure. This should include any increase in traffic congestion from the build phase.	the IAQM guidance indicates that dust will be the main construction phase impact. The guidance does not advise the assessment of congestion linked to the build phase which would not be possible to attribute to a development. Construction Management Plans would be provided for developments and routes of traffic taken into consideration through the development management process.
Northern Fringe Protection Group	6. Appendix 4 should include reference to the IAQM's A guide to the assessment of air quality impacts on designated nature conservation sites air-quality-impacts-on-nature-sites-2020.pdf (iaqm.co.uk). IBC needs to ensure all developments are compliant with this guide.	The IAQM guidance focuses on air quality assessments in support of Habitats Regulations Assessments (HRA). Reference has been added to the SPD Appendix 4 to refer to it in this context. Natural England and the Joint Nature Conservation Committee are developing a tool for project-level air quality assessment, but this is still at the development stage. Therefore, it is not appropriate to include the requirement at this stage.
Northern Fringe Protection Group	7. The SPD needs to ensure that the most recent IAQM guidance etc is always used if the referenced documents were to be updated. IBC needs to clearly state that it will require developers to fully comply with IAQM guidance for the SPD to be sound. It is not acceptable for developers and IBC to cherry pick which parts of the guidance to follow or ignore as could currently be the case.	Agreed that the versions need to be up to date – links have been updated where necessary; the date accessed is stated for clarity; and applicants have been advised to check versions. The SPD follows the IAQM guidance closely.
Northern Fringe Protection Group	8. Appendix 5 – Emissions and Damage Cost Calculators references <ul style="list-style-type: none"> • 25 Department for Environment, Food and Rural Affairs (DEFRA), Air Quality: Economic Analysis: https://www.gov.uk/guidance/air-quality-economic-analysis 	Appendix 5 and footnotes have been updated as at August 2021 and a note added to Appendix 5 as requested.

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	<ul style="list-style-type: none"> • 26 Department for Environment, Food and Rural Affairs (DEFRA), Abatement cost guidance for valuing changes in air quality: https://www.gov.uk/government/publications/air-quality-abatement-cost-guidance • 27 Department for Environment, Food and Rural Affairs (DEFRA), Air Quality: Economic Analysis – Damage Costs Approach: https://www.gov.uk/guidance/air-quality-economic-analysis#damage-costs-approach <p>All these documents are obsolete being withdrawn in March 2020. Links to the most up to date Defra guidance is required in the SPD, which should have been incorporated before the consultation commenced. Appendix 5 therefore needs to be reviewed to make sure it reflects the most recent guidance. In addition, it should be made clear that the most recent Defra guidance should always be used for Emissions and Damage Cost Calculations, with any out-of-date calculations being rejected.</p>	
Northern Fringe Protection Group	9. Likewise, the SPD (Footnote 28) needs to make it clearer that the most recent Department for Environment, Food and Rural Affairs (DEFRA), Emissions Factors Toolkit needs to be used for these calculations (this is currently implied but somewhat ambiguous).	A note has been added to the footnote placing the onus on applicants to check they have the most up to date guidance.
Northern Fringe Protection Group	10. The SPD completely fails to recognise that the development of new infrastructure is required to be delivered by IBC and SCC to tackle the existing poor air quality in Ipswich, which is non-compliant with legally binding limit value for annual average concentrations of nitrogen dioxide of 40µg/m ³ . The SPD needs to reference and recognise the importance of SCC's Transport Mitigation Strategy 2019-08.ispa_mitigation_strategy.pdf (ipswich.gov.uk), to improving air quality in Ipswich (as referenced in Chapter 8 of the Mitigation Strategy). The SPD should also set out details of how IBC, working closely with SCC, will develop and deliver new low-emission infrastructure to improve air quality and reduce carbon emissions. Failure to do so, will mean that this SPD will not support the requirements of the updated Local Plan.	More information about the range of measures explored through the ISPA Transport Mitigation Strategy has been added to section 4. The Highway Authority and partners will translate the ISPA Transport Mitigation Strategy into detailed action plans, but this is not the role of the SPD. This process is happening through multiple strands of work. For example, SCC has published the draft Ipswich Local Cycling and Walking Infrastructure Plan https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/scc_lcwip_v9_2020.pdf ; the Suffolk Local Transport Plan

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		<p>is under review; IBC signed up to a Quality Bus Partnership with SCC, Ipswich Buses and First on 25 May 2020 and a new enhanced partnership (EP) is now being formed in Suffolk as a result of the new National Bus Strategy. Transport mitigation measures through the ISPA Transport Mitigation Strategy have two areas of focus: provision of infrastructure to allow smarter choices for new development, and also modal shift measures for existing Ipswich residents. Some measures are included in the IBC Air Quality Action Plan, but many will need to be led by the Highway Authority and are beyond the scope of the SPD. Text has been added to the end of section 2 to emphasise the range of organisations from which action will be needed to address Ipswich AQ issues. Contributions will be forthcoming from all the ISPA authorities because Ipswich residents only contribute 45% of car journeys in Ipswich.</p>
Northern Fringe Protection Group	<p>11. Footnote 19 states that “Reference should be made to measures set out in the Walking and Cycling Infrastructure Strategy”. We are not aware that this Strategy has been adopted by IBC and request that a copy of the agreed Strategy be provided so we can comment on the appropriateness of these measures. If the Strategy has not been agreed, then the reference needs to be amended and a list of measures added instead. We would like to be consulted on the</p>	<p>The SCC Local Cycling and Walking Infrastructure Plan (‘LCWIP’) for Ipswich was submitted to the Local Plan Examination as a ‘Draft V9’ dated September 2020. SCC has control over any consultation on this document.</p>

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	proposed measures, which should have been included in this consultation.	<p>https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/scc_lcwip_v9_2020.pdf</p> <p>The draft Suffolk LCWIP is also available: https://www.suffolk.gov.uk/assets/coronavirus/Advice-on-travel/Local-Cycling-and-Walking-Infrastructure-Plan-for-Suffolk.pdf. There has been a delay in completing the plan due to the COVID-19 pandemic. A new date for finalising it has not been set by SCC. The schemes will be funded through the Active Travel Fund and the Ipswich Strategic Plan Area (ISPA). Ipswich area schemes have been developed as part of those identified in the five year rolling programme across Suffolk. Evaluation and analysis of their potential will be via the LCWIP project team meetings. SCC has been awarded £376,000 in tranche one and £1.685 million in tranche two from the Active Travel Fund.</p>
Save our Country Spaces	SOCS feel this SPD is inadequate and lacking in a clear accountability strategy to prevent significant adverse effects from development and afford adequate public protection from Air Pollution, both NOx and in particular particulate matter. This view is evidenced by the statement, 'The Council's Air Quality Action Plan 2019-2024 acknowledges air pollution as a major public health risk.'	The SPD supports Local Plan policies which are subject to public scrutiny and independent examination and are based on evidence including transport and air quality modelling.
Save our Country Spaces	If the purpose of this SPD is to support the draft Local Plan 'soundness' and 'legal compliance' required on Air Quality throughout the Local Plan period until 2036, SOCS feel it fails to do so. We take exception to the claims (in 1.4) where IBC claim the SPD will 'strengthen the Air Quality	This is not the purpose of the SPD, which is to support the implementation of Local Plan policies. SPDs are not subject to soundness testing, rather it is the Local Plan which needs

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	<p>Action Plan' and 'support improvements through new development- WHERE POSSIBLE'. (Our emphasis)</p> <p>Improvement and legal compliance to limit values in Ipswich are an imperative. It is disingenuous to suggest otherwise and where possible is unacceptable in public health terms. The above issues were Raised by SOCS and North Fringe Protection Group at the recent Local Plan Examination where the efficacy of the Air Quality Action Plan was also called into question. 'Air quality is a key planning consideration. The National Planning Policy Framework (NPPF) expects planning policies and decisions to help contribute to improving air quality in their local areas. The work on the Draft Car Parking for the IP-One Area SPD has been combined into the Draft Low Emissions SPD because vehicle emissions are directly linked to poor air quality in parts of the Ipswich Town Centre.'</p> <p>The scope of the Low Emissions SPD relates to mitigating emissions from transport related to new development, considering use and types of vehicles, the role of walking, cycling and public transport and the role of trees and vegetation in absorbing pollutants. Ipswich has five declared Air Quality Management Areas at locations where the annual average level of nitrogen dioxide (NO2) exceeds the national objectives. High levels of nitrogen dioxide are largely caused by vehicle exhaust fumes.</p>	<p>to be found sound. Currently the SPD relates to the 2017 adopted Local Plan and therefore has no impact on the 'soundness' or 'legal compliance' of the emerging Ipswich Local Plan. This, as an adopted plan, has already passed these tests.</p> <p>This is a matter of policy for the emerging Local Plan and not this SPD. Emerging policy DM3, paragraph 9.3.6 states that where an Air Quality Assessment shows that development would cause harm to air quality, planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels.</p> <p>As the SPD currently relates to the 2017 adopted Local Plan, wording has been added to the SPD, paragraph 3.3 (which quotes NPPF paragraph 186), to state: This SPD sets out how the Council is working to ensure that planning decisions contribute towards such compliance.</p>
Save our Country Spaces	<p>Having made the statement of risk, IBC and it's officers are legally obligated and should be held to account, with other Local Authorities, partners like Suffolk County Council, together with lay elected members in Planning and Development control committees, to refuse development, either within Ipswich or cumulatively in the Ipswich Strategic Policy Area which are likely to further endanger public health or exacerbate the Climate Emergency. The above points were made to elected members by SOCS in 2017 at a Planning Committee consideration where the officer's</p>	<p>Planning decisions are informed by the evidence presented by applicants and use the policy framework provided through the existing Government and local policy and guidance at the time an application is being considered. This includes the National Planning Policy Framework, Planning Practice Guidance, the</p>

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	<p>recommendations for a major Ipswich Garden Suburb application did not reference any of the vital WHO, NICE, and NHS Public Health ToolKIT cautions which should apply. The precautionary principle should apply in decision making for new development.</p>	<p>National Design Code and the adopted Local Plan. The SPD states in Appendix 2: 'In certain circumstances it may be justifiable to recommend refusal for development if there is an unacceptable impact on air quality and appropriate mitigation measures cannot be secured.'</p>
<p>Save our Country Spaces</p>	<p>'Based on the assessment contained in the table above, it is expected that the SPD itself will have no significant environmental effects.' SOCS Question what is meant by 'no significant environmental effects'? Positive or negative significant effects? 'Positive'?– surely a requirement, or negative? - unsustainable and unsound, will potentially impact on the Local Plan test and likely adoption? Save Our Country Spaces would disagree and suggest serious adverse negative environmental effects will ensue with the proposed Local Plan proposals and pressures which will not be dealt with by this SPD, as evidenced within our hearing statements.¹ If the purpose of this SPD is to ensure accountability for Air pollution effects, it fails to convince. It will not meet the need for any future "Ella's Law".² Landmark verdict confirms that air pollution significantly caused and significantly contributed to the death of Ella Roberta Adoo Kissi-Debrah on 15 February 2013.</p>	<p>The SEA scoping relates to the SPD and not the Local plan, which itself has been subject to sustainability appraisal incorporating Strategic Environment Assessment. The SPD contains guidance and not policy. It is policy which may have effects, and these have been considered through the Local Plan process.</p> <p>Should the legal or policy framework for air quality change, the SPD can be updated as appropriate.</p>
<p>Save our Country Spaces</p>	<p>SOCS also suggest the SPD screening exercise is not acceptable. It needs updating in the light of recent developments. 'The effect of the SPD will be to ensure that the Council will meet its duty to comply with legislation when delivering the Ipswich Local Plan.'³ SOCS disagree. The following evidence submitted to Parliamentary committees also provide the rationale as to why this SPD will fail to deliver. "Written evidence submitted by Environmental Protection UK (AQU0013) Once in a lifetime' opportunity to reduce pollution' (Appendix B areas relevant highlighted). This SPD should have been tested within the examination of the Local Plan in November /</p>	<p>The SPD does not contain policy and consequently it would not be appropriate to 'test' it within the context of a Local Plan Examination. The SPD will ensure a consistent and transparent approach to ensuring developments meet the Local Plan policy requirement to mitigate AQ effects. It provides detail to support the implementation of Local Plan policies as listed in the SEA screening. Natural</p>

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	<p>December. If that had been the case, SOCS and others would have raised the following points as to why this SPD is unfit and would fail under the Sustainability Appraisal Examination and the test of Legal Compliance. SOCS take issue with the Strategic Environmental Assessment Screening Statement. IBC state; 'The Draft Low Emissions SPD supports the implementation of Council's Adopted Local Plan (2017) policies by: Strategic Environmental Assessment Screening Statement 'The requirement to undertake SEA applies to plans and programmes which are subject to preparation or adoption by an authority at a national, regional or local level. In order to establish whether SEA is required the fundamental consideration is whether the document is likely to have 'significant environmental effects'.</p> <p>The best way to determine this is to carry out a screening assessment. If the screening assessment indicates that there could be significant effects, an SEA is needed. Therefore, this report focuses on screening for SEA and the criteria for establishing whether a full assessment is needed.'</p> <p>SOCS suggest the screening exercise and the draft SPD are not acceptable.</p> <p>' 8. Is it likely to have a significant effect on the environment (Art. 3.5)? No.'</p> <p>SOCS disagree with this decision.</p> <p>'The purpose of the SPD is to provide supporting information to the adopted Ipswich Local Plan 2017. The policies to which the SPD relates were themselves subject to SEA (incorporated within the SA) through the Local Plan preparation process. The Low Emissions SPD advises applicants of their responsibilities at different application and development stages and where to find information and advice. It sets out the process for identifying where an air quality assessment may be needed for a development application and lists a range of measures for mitigating the air quality impacts of new development, which may relate to transport, design, energy or green infrastructure. The parking guidance element ensures that parking provision within developments in IP-One takes place at an</p>	<p>England and Historic England agreed that Strategic Environmental Assessment of the SPD was not required.</p>

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	<p>appropriate level to avoid undermining sustainable travel choices.'</p> <p>'Therefore, the SPD will not itself have any significant effects on the environment and may assist in addressing potential negative effects identified in the SEA of the relevant adopted policies by helping to ensure that negative air quality impacts are avoided and mitigated. In coming to this view, due regard has been had to Annex II of the SEA Directive (2001/42/EC). The considerations of Annex II (2) were fully examined as part of the SA report for the adopted Core Strategy and Policies DPD (see Appendix 1). (No-Directive does not require SEA).'</p> <p>SOCS disagree with this decision.</p> <p>'Based on the assessment contained in the table above, it is expected that the SPD itself will have no significant environmental effects. SOCS disagree with this opinion.</p> <p>The effect of the SPD will be to ensure that the Council will meet its duty to comply with legislation when delivering the Ipswich Local Plan.</p>	
Save our Country Spaces	<p>ADDITIONALLY</p> <p>'Objective 11 of the adopted Ipswich Local Plan is to 'improve air quality and create a safer, greener, more cohesive town', and this is supported by a suite of policies addressing transport and accessibility; car parking in central Ipswich; design; green space and amenity. ' 3</p> <p>SOCS suggest otherwise. The Local Plan debate suggested otherwise. These points were raised during the LP Examination and are a matter of public record within the hearing Statements and Addendum allowed by the planning Inspectors.</p>	<p>These matters relate to the Local Plan rather than the SPD. The main policy references in the Low Emissions SPD are to the adopted Local Plan 2017. Until it has been replaced by a new plan, it remains the statutory development plan for Ipswich.</p>
Save our Country Spaces	<p>The SPD States:</p> <p>'The Ipswich Local Plan requires development to consider air quality in two ways:</p> <ul style="list-style-type: none"> - does the development proposed on its own or cumulatively impact negatively on air quality in Ipswich and how can development near or in Air Quality Management Areas ensure residents will not be exposed to unacceptably high air pollution levels?' <p>SOCS hearing statements and addendum drew attention to the unsustainable cumulative adverse impacts which included accidents on the Northern Fringe Humber</p> 	<p>Again, these matters relate to the Local Plan rather than the SPD.</p>

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	<p>Doucy Lane area. Furthermore, we believe that the proximity of the proposals for development will have a significant serious adverse effect of the LAQMA particularly the most problematic one AQMA 2. See comments submitted to Planning Applications in 2017.</p> <p>Both SPD's were subject to consultation as part of their development.'</p> <p>But critical parts of the draft SPD were NOT MET SOCS claim during LP Examination and debate.</p>	
Save our Country Spaces	<p>ADDITIONALLY The following statements cannot be substantiated by the adoption of the draft Local Plan and this Draft SPD. Particularly with respect to 'enhance and extend the ecological network and green corridor'</p> <p><i>"The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk.'</i></p> <p><i>g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green rim around Ipswich;</i></p> <p><i>Policy DM10 'Protection of trees and hedgerows'-The Council will protect and ensure the care of trees and increase canopy cover in the interests of amenity and biodiversity '</i></p> <p><i>DM17 'Transport and Access in New Developments' -To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:</i></p> <p><i>a. not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity, highway safety;</i></p> <p><i>b. not result in a significant impact on air quality or an Air Quality Management Area;'</i></p> <p><i>What is the purpose of this statement?</i></p> <p><i>The purpose of this statement is to assess the need for a Strategic Environmental Assessment (SEA) in relation to the Low Emissions Supplementary Planning Document (SPD). The SPD does not create new policy but provides detail in respect of the implementation of the adopted Ipswich Local Plan 2017 policies identified above.</i></p>	<p>The adopted Local Plan shows how policies help to implement the plan objectives and strategy, for example by identifying in the supporting text which plan objective the policy helps to achieve.</p> <p>The Low Emissions SPD will support the adopted 2017 Local Plan's implementation by providing finer grained guidance for applicants on matters such as air quality assessments and types of mitigation for any air quality impacts identified.</p>

Respondent	Consultation response received January 2021	IBC Response
	<p><i>The SPD will set out a consistent and proportionate approach to assessing and mitigating air quality impacts from new development and managing car parking provision within developments within the IP-One Area of central Ipswich, so that development can proceed in a timely, appropriate, legally compliant and policy compliant manner in Ipswich.</i></p> <p><i>'Previous comments received are located in the Consultation Statement together with the Council's responses indicating how points raised have been addressed in the single draft Low Emissions SPD.'</i></p> <p>POINTS RAISED REMAIN UNADDRESSED</p>	
Save our Country Spaces	Local Plan Hearing Statement Addendum Dec 2020 (<i>attached in full to the Low Emissions SPD response</i>).	The points raised relate to the emerging Local Plan and were considered through the independent examination of the Local Plan. This is not relevant to the SPD.
Save our Country Spaces	<p>Appendices attached to response: Appendix A – Northern Fringe Protection Group Response. Appendix B The EFRA Committee and the Environment Bill. Written evidence submitted by Environmental Protection UK (AQU0013) 'Once in a lifetime' opportunity to reduce pollution.</p>	<p>Please refer to the responses above to NFPG representations.</p> <p>The other points raised relate to national legislation including the forthcoming Environment Bill, and not to the Low Emissions SPD. When national legislation relating to land use planning changes, those changes would be taken into account through the future reviews of the Local Plan and SPDs.</p>
Save our Country Spaces	Appendix 1 to comments – Copied Local Plan Hearing Statement Addendum Dec 2020	This relates to the emerging plan, and was submitted in response to the examination, and not the Low Emissions SPD. This document has been considered by the Inspectors as part of their consideration to the soundness of the Local Plan.

Respondent	Consultation response received January 2021	IBC Response
Save our Country Spaces	Appendix 2 to comments – Copied written evidence submitted by Environmental Protection UK in response to the Governments EFRA Committee and the Environment Bill	<p>This evidence was produced and submitted to the Government and has been copied as an Appendix to the Low Emissions SPD consultation. Due to the nature of the submission some areas are broadly relevant to the SPD but no specific mention of it is made in the comments.</p> <p>Air Quality is considered by IBC both through the planning process and the Environmental Protection team responsibilities. In response to AQMAs IBC has adopted an AQAP. This is being reviewed and considered in accordance with professional advice from SCC as Highways Authority, and guidance from DEFRA.</p> <p>Through the DM process planning applications are considered in accordance with adopted Local Plan policies and the advice of the Environmental Protection team amongst others.</p>
West Suffolk CCG, Ipswich & East Suffolk CCG, North East Essex CCG	<p>Thank you for consulting Ipswich & East Suffolk CCG and West Suffolk CCG on the above consultation for the Low Emissions Supplementary Planning Document (SPD). Air quality and emissions have a significant impact on public health and climate change, we are pleased to note the health impacts are referenced in section 1.1.</p> <p>In reviewing the context, content and draft SPD, the following comments are predominantly with regards to primary healthcare provision on behalf of Ipswich and East Suffolk Clinical Commissioning Group and West Suffolk Clinical Commissioning Group (CCGs).</p> <p>The content of the SPD aligns strongly with the wider national NHS objectives to become Net Zero organisation by 2040 (as outlined in Delivering a Net Zero National Health</p>	<p>We welcome the confirmation that the SPD aligns with NHS objectives to become Net Zero.</p> <p>Reference to the NHS guidance 'Putting Health into Place' has been added to section 4 (4.29) to expand the explanation of what is meant by 'good design'. A link to the 'Design, Deliver and Manage' document has been added as a footnote.</p>

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	<p>Service). As part of this commitment, the CCGs are developing a Green Plan that will set a strategic vision to achieve this. The Green Plan will include commitments to enable and facilitate healthier patient and staff lifestyles, exploitation of emerging green transport and travel requirements and community wellbeing in the context of a post COVID society. All these elements will directly compliment the SPD approach. The NHS England Healthy New Town Programme has attempted to create physical and social environments that promote health and wellbeing, and to ensure that residents of new places have access to integrated health and care services. Within the scope of this programme, guidance has been developed. The guidance 'Putting Health into Place' is framed around 10 principles. These include maximising opportunities for 'active travel' and 'to foster health in homes and buildings'. As an organisation the CCG will use these guidelines in future related work. We would urge the council to include reference to this in the SPG guidance thereby, providing further integration of our respective organisation's partnership approach.</p> <p>Conclusions</p> <p>This response follows a consultation by Ipswich Borough Council.</p> <p>The CCG will give due consideration to the SPD in relation to our activities.</p> <p>In its capacity as healthcare commissioner, the CCG have requested that the Local Planning Authority identifies policies and strategies that are considered to directly or indirectly impact upon healthcare provision. The CCG has responded with comments to help shape future policy.</p> <p>The CCG has identified some key areas for consideration namely, reference to using the 10-point plan guidance outlined in 'putting Health into Place', adequate provision of active transport opportunity, widening of scope in relation to parking provision for healthcare workers and ensuring these two areas are interlinked.</p> <p>The text revision recommendations set out are those that the CCG deem appropriate. However, if the recommendations are not implemented then NHS England and the CCGs reserves the right to make</p>	

Respondent	Consultation response received January 2021	IBC Response
	representations about the soundness of the SPD at relevant junctures during the adoption process.	
West Suffolk CCG, Ipswich & East Suffolk CCG, North East Essex CCG	CCG comment: The body of the text in 5.29 should be revised in order to reflect/acknowledge the UK governments 10-point plan for a green recovery and the announced changes to Electronic Vehicle sales and associated infrastructure requirements.	Reference to the Ten Point Plan for a Green Industrial Revolution has been added to paragraph 5.35.
West Suffolk CCG, Ipswich & East Suffolk CCG, North East Essex CCG	<p>CCG comment on 5.33 (consultation text in italics) below.</p> <p><i>Operational parking space is the space required for cars and other vehicles regularly and necessarily involved in the operation of the business of particular buildings throughout the working day. It includes space for commercial vehicles delivering goods to or collecting them from the buildings, space for loading and unloading and for picking up and setting down of passengers. It does not include staff car parking.</i></p> <p>CCG comment: parking provision for staff is required particularly on call regardless of if the building is operational or not (i.e., working day). Adequate provision for public transport access and alternative modes of transport are also necessary to implement a fair policy if staff car parking is excluded.</p>	The example of 'other on-call staff involved in healthcare provision' has been added to the list of examples of possible operational car parking in paragraph 5.40. The Central Car Parking Core shown in Figure 3 of the SPD only covers the town centre of Ipswich, and as a result enjoys good public transport accessibility.
West Suffolk CCG, Ipswich & East Suffolk CCG, North East Essex CCG	<p>CCG comment on 5.34 (consultation in italics) below.</p> <p><i>Examples include: spaces for school contract buses on education sites; spaces for doctors and for setting down patients at health centres; spaces for security vans at banks or building societies; and spaces for delivery vehicles at shops.</i></p> <p>CCG comment: Operational space should not be defined solely on Doctor use for healthcare facilities. We suggest an alternative wording that incorporates staff use in relation to 'healthcare provision' (so to not exclude relevant staff and partner organisations staff within our wider Integrated Care system).</p>	The example of other on-call staff involved in healthcare provision has been added to the list of examples of possible operational car parking in paragraph 5.40.

Consultation Statement

Call for Ideas Stage, 2015 and 2017

The description below of the ‘call for ideas’ process refers to two separate SPDs, because the early engagement on these matters pre-dated the decision in 2019 for combine the two SPDs into one document.

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 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. The four key approaches to reduce emissions should therefore be: -	The scope of the SPD is more focused, seeking to guide applicants through processes such as air quality assessments. The issues 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.

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
	<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 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</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 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.</p>

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
	<p>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>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	<p>Parking standards within this area have a fundamental impact on Ipswich Buses.</p> <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>The draft SPD proposes a car parking standard for IP-One which consists of a zero minimum and then a maximum level of provision. 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</p>

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	<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>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</p>	<p>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> <p>Agreed and the ISPA Transportation Mitigation Strategy and Action Plan will support sustainable choices. Within the central Car Parking Core, only operational parking is allowed as per policy DM18.</p>

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
	<p>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>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>
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	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.	The Park and Ride site is protected through the adopted Local Plan 2017. How services are organised is out with the scope of the

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
	<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 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>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> <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</p>

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	<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>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. 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. 4. IBC should commit to working with SCC and neighbouring authorities to eradicate all Ipswich AQMAs within an agreed timescale. 	<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 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>

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
(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 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</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> <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>

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
	<p>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 is also currently working 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 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</p>

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
		<p>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>
NFPG	<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, 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</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 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>

Respondent	Call for ideas comments received 2015 and 2017	IBC Response
	<p>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 infrastructure through the provision of more dedicated cycle lanes and better road maintenance. - Improve the “green lungs” in and around AQMAs." 	<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 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</p>

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		<p>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>
<p>NFPG</p>	<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> <ul style="list-style-type: none"> - 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. - The forecast Increased traffic from the Ipswich Garden Suburb on both these areas. - 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. - The demolition of the old KwikFit building will have temporarily improved the ability for pollutants to dissipate. - The proposed new school at the old Co-op is likely to impact of traffic flows. <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</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 mean national objective level for NO2.</p>

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	<p>reduce the boundaries of the existing AQMA5 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>	
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 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</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 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</p>

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	<p>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>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); · 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</p>	<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 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</p>

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	<p>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>individual developments through the planning application process. 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	<p>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 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>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 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>

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	<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> <p>- Recognition of the role of parking in managing traffic and encouraging a shift to more sustainable modes of transport.</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>
SCC continued	<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. The countywide guidance notes that lower provision for A, B, C1 and D class uses may</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</p>

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	<p>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> <ul style="list-style-type: none"> - Assisting efforts to manage air quality issues in the town centre. <p>Allied to reducing congestion, properly managed parking could, by encouraging modal shift, help reduce vehicular emissions. There are four declared air quality monitoring 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> <ul style="list-style-type: none"> - Recognising the needs of different people <p>1 http://thegreatbritishhighstreet.co.uk/pdf/GBHS-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</p>	<p>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 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</p>

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	Ipswich and Suffolk's ageing populations, the Borough Council could consider ways in which the Lifetime Neighbourhoods principles could be embedded into parking design.	the Suffolk Guidance for Parking.
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 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</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> <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</p>

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	<p>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>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 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	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 site is protected through the adopted Local Plan 2017.

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	<p>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>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> <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 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.</p>

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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.