

## **Appendix Detailed Comments on Mersea Homes/CBRE's Planning Application**

The following details are specific comments on key application documents. Some of these comments apply to several of the documents and have been repeated for completeness. Note that the Ipswich Garden Suburb will be denoted as IGS throughout the appendix

### **• The National Planning Policy Framework**

The National Planning Policy Framework (NPPF) sets out three dimensions to sustainable development: economic, social and environmental. Our submission clearly demonstrates that the application fails all three dimensions as it:

- does not identify and coordinate development requirements including the provision of the necessary infrastructure;
- fails to create a high quality build environment and does not adequately support health and social wellbeing;
- does not improve biodiversity or use resources prudently, will not minimise pollution or sufficiently mitigate and adapt to climate change nor move to a low carbon economy.

Our submission shows that the application:

- does not sufficiently address key site-wide issues including strategic infrastructure;
- does not sufficiently promote sustainable transport;
- will not deliver high quality homes ;
- is not of good design;
- will not adequately promote healthy communities;
- fails to demonstrate that it will meet the challenge of flooding or climate change
- will not sufficiently conserve and enhance the natural environment.

The application consistently fails to comply with IBC's local plan in relation to policies CS1, CS2, CS5, CS15, CS16, CS17, CS19, DM1, DM2, DM3, DM4, DM5, DM10, DM15, DM17, DM18, DM24, DM29 and DM 32. It is also non-compliant with the draft IGS Masterplan in relation to these areas.

Statutory consultees that have raised major objections and/or concerns include Anglian Water, Environment Agency, NHS England, Sport England, Suffolk Constabulary, Suffolk County Council, and Suffolk Wildlife Trust. These objections reiterate our concerns and demonstrate that the application is non-compliant with the NPPF.

The planning application must be dismissed accordingly.

### **• Community Involvement**

We appreciate the efforts that Mersea Homes/CBRE undertook with respect to consulting the Community. It is disappointing that the consistent views expressed by residents were mainly ignored in the planning application documents.

2.13/2.14 We appreciated the well staffed exhibition with many of our members spending a considerable amount of time sharing their concerns with Mersea Homes/CBRE representatives. We strongly object to the way Mersea Homes/CBRE has portrayed the lack of written responses received at the exhibition. Our members were repeatedly assured that their verbal views would be taken on board and considered accordingly. Members were also told that they did not need to fill in comment cards. The strength of public feeling should be judged by the number of previous comments on the

Northern Fringe/IGS consultations and on the Mersea Homes/CBRE planning application rather than on a distorted representation provided by Mersea Homes/CBRE.

2.15 Many of the statements provided in this section are false.

- We note that many of the specifics of the planning application were not available to be viewed e.g. the sewage infrastructure proposals.
- The statement that “Mersea Homes is committed to delivering a quality development that sets a high benchmark for the rest of the development.” is completely contradicted by the poor quality, incomplete and inconsistent application for the considerable number of reasons we detail below.
- We note that the Environment Agency is of the opinion that a full Flood Risk Assessment has not been submitted.
- We note that Anglian Water has objected to the application.
- We note that a full air quality report has not been submitted.
- The Transport Assessment may be detailed but it is completely flawed. It cannot be cross-referenced as it uses different phasing to other documents and to the multi-start approach across the IGS, which has been ignored in the 2021 scenarios.
- New homes should meet IBC’s standards and there are no proposals whatsoever to provide renewable generation for homes, contrary to DM2, or to achieve the Code for Sustainable Homes as required by DM1.

This would appear to suggest that Mersea Homes/CBRE is apparently misleading the public and seems to be seeking to do likewise with IBC.

- **Planning Statement**

2.35 States that there are two broad phases, unlike the Design and Access Statement which states there will be Phases 1-4 (including Phase 1a and 1b totalling 185 dwellings), although the accompanying diagram shows three phases with subsets (totalling six). The Transport Assessment appears to be based on two Phases - Phase 1 providing 150 dwellings and Phase 2 providing 665 dwellings.” The Foul Water Assessment is based on Phases 1A-1E (where Phases 1A and 1B total 260 residential units). This is completely inconsistent.

With regard to sustainable travel, the Planning Statement is inconsistent with the proposed Phase 2 gyratory system which does not include pavements and dedicated cycle ways. This is non-compliant with CS5, DM5, DM15, DM17 of the Core Strategy.

- **Design and Access Statement**

Phasing is inconsistent across the documents and it is impossible to understand what is actually proposed. The planning application must be resubmitted for consultation with the proposed phasing consistent across all documents.

The conflicting statements and insufficient detail contained in the application means that it is impossible to conclude that the development as a whole would be of sufficiently high standard. This is most evident with the different phasing right across the application, conflicting highway design and lack of foul water solution. The non-provision of cycle and pedestrian routes on Westerfield gyratory system and the removal of existing dedicated cycle lanes and non-compliance with many CS policies clearly illustrate that the application is of poor quality. The application is non-compliant with Objectives 1, 2, 6, 7, 8 and 9 of the Core Strategy.

The draft IGS Masterplan agreed by the IBC Executive concludes “that a serviced site with contributions is now seen as the optimal solution for the delivery of a health centre, rather than a reserved site as currently specified in the draft SPD. It is therefore advised that in order to ensure new primary health care capacity is delivered for IGS residents, a site of sufficient size to meet the related health care needs is provided, along with developer contributions in order to bring forward a health centre at an appropriate point by an NHS body. It has been ascertained that based on the population arising from IGS, a 0.2ha sized site is an approximation of the area required at this stage to accommodate 6 GPs, which would include parking, drainage and landscaping.” Mersea Homes/CBRE propose the possible identification of a health centre site but this clearly does not go far enough. A serviced health centre site with Mersea Homes/CBRE contributions must be provided to meet IGS health demands to comply with CS17, CS19, DM32 and the IGS Masterplan. We note that NHS England has objected to the application.

The planning application fails to take account of the proposals of Network Rail to re-locate Westerfield station to a more central position on the IGS, which clearly offers a more sustainable travel solution. The implications of this and Network Rail’s proposals to increase the speed and frequency of freight traffic need to be reflected in the application documents. Without this consideration the application is incomplete and non-compliant with CS5 and DM17.

3.5 Firm commitment needs to be given by Mersea Homes/CBRE that it will not use their land as a ransom strip for the bridge before the planning application can be approved. Without this sustainable development of the IGS cannot be guaranteed and would be in breach of the NPPF and CS5, CS17 and DM17. This was identified as an issue that had to be resolved before granting planning permission by the Planning Inspectorate at the previous planning inquiry.

4.6 The application must specify the arrangements to secure the construction of a secondary school. This should be in place prior to development commencing in order to meet an agreed timetable for delivery. Currently it is non compliant with the IGS Masterplan, CS15, CS17 and DM32.

4.11 – 4.13 Open space of 11.89 hectares is proposed including surface water attenuation areas. A detail of the breakdown of this is required especially on the amount of useful open space and outdoor sports facility. We note that Sport England has objected to the application.

The amount of outdoor sports facility must be compliant with the CS16, CS17, DM3 and DM29 and CS Appendix 6. In order to be useful, a planning condition must be imposed to ensure that all outdoor sports space is flat, level and well draining.

Principle 7: This needs to specify that this will be in accordance with IBC’s requirements as part of its recycling strategy (as in Paragraph 4.5.2). Bin storage should be sufficient to accommodate three waste bins per home as used in Ipswich. Current designs only show space for two bins for some homes. Without this the application is non-compliant with CS Policy DM5. In addition, the bin storage should be concealed when viewed from the street so as to discourage the unsightly habit of bins being left in front of houses or on the footpaths.

Principle 8: 1 metre minimum set-back for front gardens will not provide privacy to front rooms of dwellings at the ground-floor level. This should be increased accordingly. Without this than the application is inconsistent with CS2 and DM5.

4.5.4 Given the proposed national smart meter rollout, smart gas meters should also be installed as well as smart electricity meters. If not these would have to be replaced as part of the national rollout programme which is not sustainable and counter to the aim of a high quality, low carbon development and inconsistent with CS1, DM1 and DM5.

4.6.8 Needs to include renewable solutions to be compliant with Policy CS1 and DM2. Also needs to include carbon saving measures for the district centre and community facilities and for the energy requirements of the two pumping stations in relation to be complaint with DM1.

Section 4 needs to include an overview of the foul water strategy. We strongly agree with Anglian Water's proposed planning condition for the IGS site that *"No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority."*

Suffolk County Council Car Parking Guidance 2014<sup>1</sup> must be met by the development. These state that "Garages of size 7.0m x 3.0m are considered large enough for the average sized family car and cycles, as well as some storage space, and will be considered a parking space. Any smaller and the garage could not be considered a car parking space or count towards the parking space allocation." Therefore the current garage proposals are non-compliant with DM18 and inconsistent with DM5. Although the application states that the provision for car parking will be made in accordance with the standards and policy set out by Ipswich Borough Council and Suffolk County Council the appended diagrams show an under provision that is non compliant e.g. 3 not 2 spaces should be provided for homes of 4 or more bedrooms. In addition there is little provision for on street parking. We also suggest a condition is placed on the development which prevents garages being subsequently converted into other accommodation, which would then breach parking standards.

Points of access/4.8 etc The simple priority junction needs to include a controlled crossing facility or underpass that allows schoolchildren to safely access the secondary school by foot and on cycle. It also needs to be on a formal cycle route otherwise the application is non-compliant with the IGS Masterplan and CS5, DM5 and DM17.

With regard to sustainable travel, the Design and Access Statement is inconsistent with the proposed Phase 2 gyratory system, which does not included pavements and dedicated cycle ways. We have major concerns with the proposed Northern junction of the gyratory system and note that the two diagrams in Appendix E for the northern junction are different.

There are also major safety issues for residents having to cross two lanes of traffic when turning right out of/into their drives and reversing in/out of drives onto two lanes of traffic. This is in breach DM5a and DM17. The proposed changes to Valley Road are in breach of the draft Urban Character SPD for the Parks area.

Grove Sports Ground -This needs to specify the minimum area set aside for sports use and that the two football pitches will meet 11-a-side local league size requirements in order to be compliant with CS16, CS17, DM3 and DM29.

Westerfield Rd allotments -The minimum area set aside for allotments must be specified in order to ensure compliance with DM3.

Southern Pocket and Vere Way Parks -These needs to specify the minimum area set aside for Local Equipped Areas for Play (LEAPs) in order to ensure compliance with CS17, CS17 and DM3.

7.3 The text of the Phasing states that there will be Phases 1-4 (where Phase 1, 1a and 1b, totals 185 dwellings), which does not match the diagram comprising three phases (plus subsets). We also note

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<sup>1</sup><http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Planning/Suffolk%20Advisory%20Parking%20Guidance%202014.pdf>

that the Planning Statement says there will be two broad phases as does the Transport Assessment with Phase 1 providing 150 dwellings and Phase 2 providing 665 dwellings. The Foul Water Assessment is then based on another different Phasing - Phases 1A-1E (where Phases 1A and 1B total 260 residential units). Until the application contains consistent phasing across all its assessment it is premature and should be dismissed accordingly.

The application fails to address the provision of a country park in line with the recommendations of the Habitat Regulation Assessment (HRA) screening report as part of a mitigation strategy for the likely significant effect on the Stour and Orwell Estuaries Special Protection Areas and RAMSAR sites. Page 20 of the HRA states “Importantly, in order to be effective that defined areas of the country park relating to each of the residential developments of the Garden Suburb would need to be delivered in advance of occupation of the first dwelling”. In order to be effective, the country park must be part of an integrated IGS Masterplan and clearly cannot be dependent on the timing of the Henley Gate development. Mersea Homes/CBRE’s proposed “do nothing” approach is in breach of European legislation. If the Henley development fails to come forward in a timely manner, or is curtailed just below the threshold for the delivery of the country park then the mitigation strategy will completely fail. It would appear that IBC would therefore be in breach of European legislation and would be prosecuted accordingly.

The application fails to provide a comprehensive sustainable access and movement strategy or the outline travel plans for the development as a whole as requested by AECOM, on behalf of Suffolk County Council, in its response to the Scoping Note. Paragraph 3.27 of this stated ‘The applicant will be expected to provide a comprehensive sustainable access and movement strategy in keeping with the Northern Fringe Transport Strategy and which will help to ensure that this target can be met.’ and Paragraph 6.3 ‘The Transport Assessment Scoping Note includes no reference to Travel plans for the development proposals. An Ipswich Northern Fringe Framework Travel Plan will be required, setting out the general approach and key objectives to encouraging sustainable travel across the wider area. The applicant will be expected to facilitate the development of this Framework Travel Plan, while individual Outline Travel Plans would be required at planning stage for each distinct component of the proposed development. The outline travel plans and transport assessment should be intrinsically linked with a distinct focus on optimising the potential to promote sustainable travel from the proposed development and consistent with the objectives of the wider area Framework Travel Plan.’

- **Detailed Application**

The detailed application omits any mention of the infrastructure required to meet foul water requirements. The application needs to show the position of the proposed pumping station, which appears to be on land outside the initial phase, and the connection to the main sewer, which runs underneath proposed roads in later phases. The detailed application is therefore incomplete, in breach of CS17 and should be dismissed accordingly.

- **Infrastructure Plan**

2.44 The Infrastructure Tables have far too many gaps indicating that this outline application is premature. This is non-compliant with CS17, the IGS Masterplan and the economic dimension of the NPPF. More detail is required before permission can be granted.

Community sports facilities need to be added to the Infrastructure table as requested by Sport England.

Table 2.1 and 3.21 The application fails to take account of the proposals of Network Rail to re-locate Westerfield station to a more central position on the IGS and needs to consider these accordingly in order to be compliant with CS5, CS17, DM17 and the IGS Masterplan.

3.20 This needs to specifically include improvements to the Avenue and the existing Christchurch Park bridleway to allow safe cycle and pedestrian access to the town centre. Currently there are no safe escape routes along the bridleway for users if confronted. Without this the application is non-compliant with CS5 DM5 (paragraph 9.48), DM17 and the IGS Masterplan.

3.27 This is not the case with foul water infrastructure.

3.29 This needs to include foul water infrastructure.

3.45 This needs to be confirmed by Anglian Water before the application can be approved. Without this detail the application is premature, non-compliant with CS17 and the NPPF economic dimension and should be dismissed. The Foul Water Plan provided as part of this application indicates that there would be two pumping stations on the Mersea Homes/CBRE site. Confirmation is required from Anglian that the proposed solution will be satisfactory for the entire IGS site.

The location of all storage tanks for the entire IGS and sewage pipe upgrades needs to be identified and subject to Environmental Impact Assessment, which needs to include an assessment of the costs and impacts of traffic flow during the construction phase. Without further details the application is non-compliant with CS17, the IGS Masterplan and the economic dimension of the NPPF. In our opinion, the sewage pumping and storage solution is inconsistent with DM1 in relation to the requirement for "high standard environmental sustainability".

3.49 The application must specify the arrangements to secure construction of a secondary school. This needs to be in place prior to development commencing in order to meet an agreed timetable for delivery. Currently it is non-compliant with the IGS Masterplan, CS15 and CS17.

3.51 This needs to contain a full breakdown of the proposed Open Spaces, including the quantity of outdoor sports space, which are needed to demonstrate compliance with CS16/DM3/CS Appendix 6 standards.

3.56 Needs to include the proposed relocation of Westerfield Railway Station as a potential barrier. The lack of a confirmed foul water solution also needs to be identified as a potential barrier as does the potential high cost and impact on traffic flows during the construction phase for the foul water plan. The potential high cost and impact on traffic flows and residents during the construction phase for the proposed highway modifications should also be included.

4.02 The application does not adequately set out a solution for foul water infrastructure and is therefore premature.

There is no mention of the likely need to relocate the gas main and HV cable running under Valley Rd due to the proposed installation of the sewage storage tanks. This needs to be considered in order to comply with CS17.

The application does not contain an acceptable Flood Risk Assessment for the Mersea Homes/CBRE site or the IGS as a whole and is therefore premature. We strongly agree with the Environment Agency that the submitted FRA does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development in relation to the adequacy of the surface water receiving system and demonstrate that the post-development volume of surface water runoff will be

controlled so that it does not exceed the existing Greenfield volume. This is required in order to comply with CS1, CS17, DM4 and the NPPF. The application needs to reflect the importance of maintaining surface water run-off areas including porous paving referred to in Drawing No 2013s7555-021 and identify the body responsible for maintaining these assets and how this would be funded,

### Appendix E Proposed improvements to junctions

These differ from the plans contained in the Transport Assessment Plans e.g. the Henley Rd/Valley Rd junction. Both plans show the removal of the cycle lanes around Henley Rd and Dale Hall Lane on Valley Rd. Removal of the dedicated cycle lane along Valley Rd is in breach of CS5, DM5, DM17 and the NPPF e.g. around Westerfield roundabout, around the Dale Hall Lane junction. The proposed changes to Valley Road are in breach of the draft Urban Character SPD for the Parks area.

The proposed lane re-alignment and allocation changes at the Henley Rd/Valley Rd junction to improve pedestrian/cycle access due to take place October 2014 have been ignored by Mersea Homes/CBRE. Their proposals are inconsistent with these changes and will make cycling more difficult than it already is. Mersea Homes/CBRE needs to revisit its proposed changes to the Henley Rd/Valley Rd junction accordingly.

The application needs to show the changes to Valley Rd past the Dale Hall Lane junction in the direction of Norwich Rd re: two lanes. Likewise any changes at the Norwich Rd roundabout required to manage the increased traffic flows.

The application needs to show the changes to Westerfield Rd past Valley Rd in the direction of the town re: two lanes.

The extent of the introduction of two lanes on each side of Valley Rd from Henley Rd junction in the direction of Westerfield Rd needs to be detailed. We note the plan in this Appendix is different to the plan in the Transport Assessment. Mersea Homes/CBRE needs to identify the correct plan and resubmit for further consultation. If the two lanes continues past the Avenue then a controlled junction will be required to allow access to/from the Avenue and associated roads.

The location of the controlled crossing to allow access to/from the Fonnereau Way needs to be included in the Infrastructure Plans.

All pavements need to show dimensions and be wide enough for people with prams/mobility scooters to pass safely. Several sections do not appear to be wide enough. In particular, the proposed 1.5m pavement is in our opinion not wide enough for safe transit on a busy main road that will have high pedestrian use as part of the IGS sustainable travel plans. This would be in breach of DM5 (paragraph 9.48) and DM17.

The Henley Rd junction by Henley Court could be widened to allow a separate line for traffic turning right to improve traffic flow. This is the most obvious improvement needed but has been omitted.

Signal controlled pedestrian crossings would be required to allow safe crossing of up to five traffic lanes around the Westerfield Rd roundabout if the existing "halfway stops" are removed. It is not clear if they will be maintained.

The removal of the grass verges and trees alongside Valley Rd would breach CS1, CS16 and DM10. The current landscaping is typical of a Garden Suburb style and removing the grass verges and trees is counter to the intention of creating a garden suburb.

Appendix 7 paragraph 4.4.3 proposes that the service 118/9 be extended into the development. In this case the signalised junction on to Westerfield (shown in plan 11) will have to be re-designed to accommodate the swept area of a bus turning left to head north.

The proposed Phase 2 northern and southern junction of Westerfield Rd needs to include cycle lanes to be compliant with the Core Strategy and the NPPF.

The lack of pavements on the northern and southern section of the Westerfield Rd Phase 2 gyratory system is totally unacceptable and non-compliant with CS5, CS17, DM5, DM17 and the NPPF.

We are concerned that the proposed Phase 2 northern section (as illustrated on the northern section diagram) creates a blind spot for traffic, pedestrians and cyclists crossing into the Mersea Homes/CBRE site, especially given the proposed location of the secondary school. This would appear to be unsafe and non compliant with DM5 and DM17.

We are concerned that the junction plan for the Phase 2 northern section of the gyratory system is different to the junction plans shown for the gyratory system as a whole. The actual proposal is therefore unclear.

We are concerned that secondary school traffic wanting to turn right onto Westerfield Rd will back up and block the Phase 2 northern gyratory junction. This needs to be modelled assessed in detail and presented as part of the consultation process.

We are concerned that the only Phase 2 access to the Mersea Homes site from Westerfield Rd is at the northern end towards the level crossing. Given Network Rail's plans to increase the frequency of freight services, which will be long trains of many containers, this is likely to result in traffic being back up both along the gyratory system and within the development. This needs to be modelled/assessed in detail and presented as part of the consultation process.

The gyratory system needs to be provided with complete pavements and include dedicated cycling facilities on both sides as this is the main route to the secondary school.

Dedicated cycle stops are required on all junctions to be compliant with CS5, DM5 and DM17

The IGS Masterplan and associated Sustainability Appraisal do not consider/assess the Valley Rd highway changes; this needs to happen. As proposed, the changes are inconsistent with the IGS Masterplan and non-compliant with the Core Strategy. They should be rejected accordingly. There is too much uncertainty and ambiguity with the proposed junction improvements. These need to be revised and resubmitted for further consultation.

Appendix H This is incomplete as it fails to show the location of the required storage tanks. It also only shows one pumping station on CBRE land, which is inconsistent with the Foul Water Plan which has two. This lack of detail demonstrates that the application is premature.

- **Environmental Statement**

Sensitivity analysis of the cumulative effects of traffic flows arising from the entire IGS development is required as requested by SCC.

The Environmental Impact Assessment (EIA) within the Environmental Statement needs to assess the sensitivity and severity of the traffic impacts on the roads nearest to the IGS rather than average

the impact on flows across the modelled area. This should be based on Tuddenham Rd, Westerfield Rd, Henley Rd and Valley Rd. The model must be correlated with traffic flow surveys on these areas as they are the ones that will be affected most. We note that the correlation of the model with these areas is poor. Traffic flow survey data must include Westerfield Rd as this is the only access to/from the Mersea Homes/CBRE site.

The EIA needs to assess the effectiveness of the sustainable travel proposals based on a comprehensive sustainable access and movement strategy and outline travel plans. However, these have not been provided despite being requested by AECOM, on behalf of Suffolk County Council, in its response to the Scoping Note.

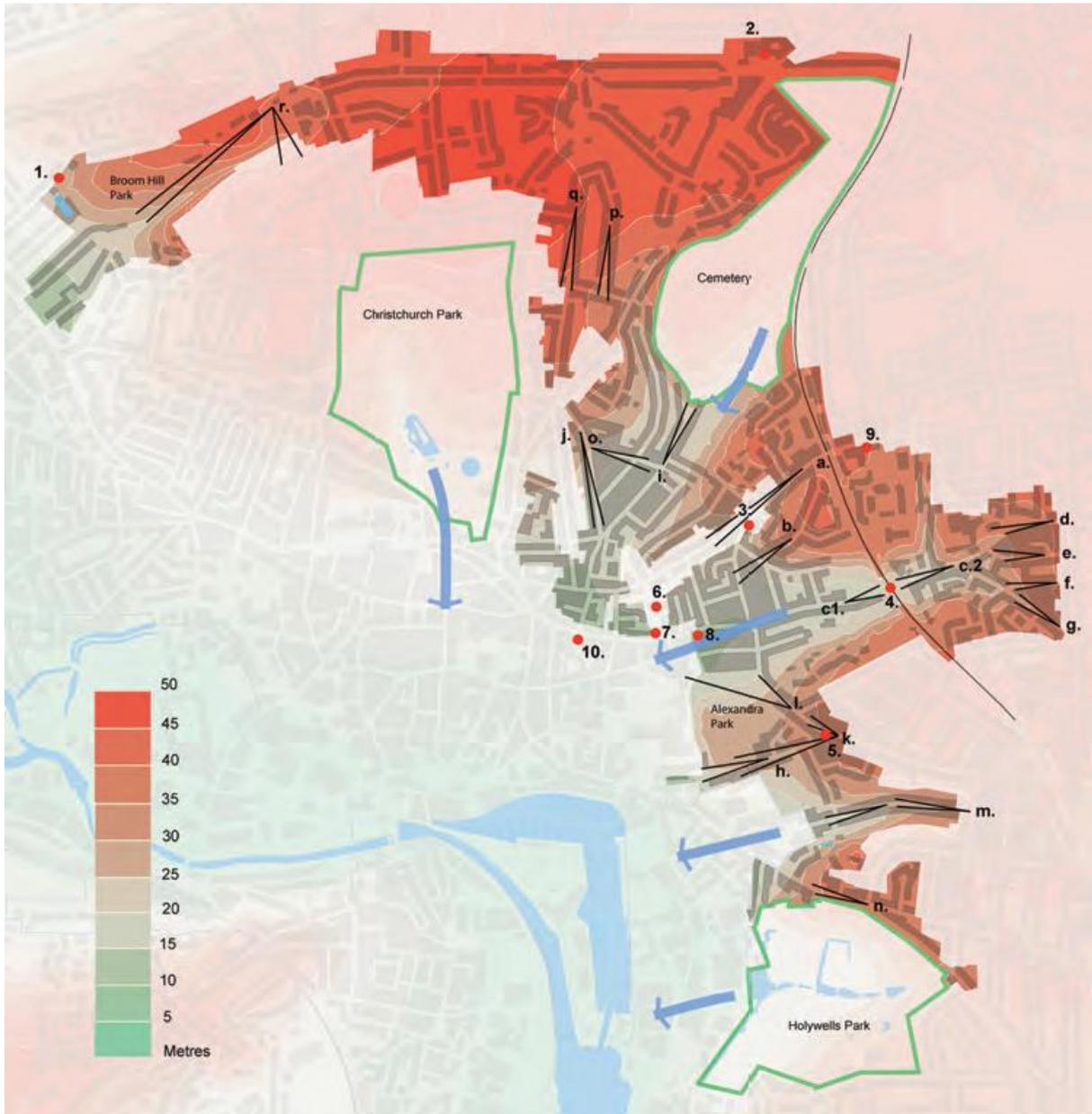
The EIA fails to take account of the impacts of the proposed road changes during the construction phase. These will result in the partial or even full closure of Valley Rd and Westerfield Rd resulting in rat-running, local and wider traffic congestion due to knock-on traffic effects that Ipswich regularly suffers from. The EIA needs to be resubmitted with full assessment of the traffic impacts during the construction phase. The proposed changes to Valley Road are in breach of the draft Urban Character SPD for the Parks area which needs to be reflected in the EIA with respect to loss of trees and grass verges etc.

An assessment of the health impacts of the proposed highway changes on residents of Westerfield and Valley Roads needs to be provided as part of the EIA. Specific noise and air pollution assessments of the proposed highway changes need to be included in the EIA. The EIA needs to be resubmitted with sufficient detail for the general public and statutory bodies to assess these impacts. There is a major safety issue that also needs to be assessed by the EIA - the need for residents to cross two lanes of traffic when turning right out of their drives and reversing on/out of drives onto two lanes of traffic.

The EIA needs to assess the impact of the removal of the telephone poles and existing street lighting that will be required as part of the highway works. Telephone wires should be buried and state of the art replacement street lighting installed. The effects of moving streetlights closer to homes needs to be assessed with regard to increased light pollution.

The EIA needs to recognise that the proposals for the Phase 2 gyratory system do not include pavements and dedicated cycle ways. We have also major concerns with the proposed Northern junction of the gyratory system with regard to safety, congestion and hence air quality. We note that the two diagrams in Appendix E for the northern junction are different. The proposed solution for the gyratory system will not promote sustainable travel and is non-compliant with the IGS Masterplan and the Core Strategy.

5.81/5.84 Whilst the topography of Ipswich is in general well suited to cycling it should be noted that there is a hill when cycling out of the town centre to the Northern Fringe as illustrated on pg 8 of the draft Urban Character SPD for Parks (see below). This was used as an official "mountain climb" in the 2012 Mens Tour of Britain with the finish of this King of the Mountains points stage at the top of Christchurch Park. Only cyclists and pedestrians in good physical health will be able to cycle or walk from town. The EIA and the traffic assessment must recognise this restriction and include details of how it is taken into account during its assessment.



6.98 Pedestrians and cyclists are less likely to use Fonnereau Way if it is hoarded off during the construction phase due to safety concerns. In particular, there would be no “escape” routes in the event of any incidents, which is unacceptable. This will discourage sustainable travel and is in breach of CS5, DM5 and DM17. It will also increase traffic flows. All “hoarding off” should take the form of a see-through material e.g. chain fence, be lit and kept to a minimum i.e. only occur where construction work is ongoing. “Escape” routes must be provided at regular intervals.

Outdoor space of 11.89 hectares is proposed. Details of the breakdown of this is required especially on the amount of useful space and outdoor sports facility (should be either 3.12 (larger households) or 2.87 (census) hectares to be compliant with the Core Strategy.

The EIA needs to address the delivery of the country park and the dependency on the Henley Gate development, as the application fails to implement the recommendations of the Habitat Regulation Assessment (HRA) screening report for the mitigation strategy to address the likely significant effect on the Stour and Orwell Estuaries Special Protection Areas and RAMSAR sites. The EIA must assess the impacts on these sites between the “do nothing” approach proposed by Mersea Homes/CBRE which is in breach of European legislation and the HRA recommendation that “Importantly, in order

to be effective that defined areas of the Country Park relating to each of the residential developments of the Garden Suburb would need to be delivered in advance of occupation of the first dwelling". In order to be effective, the Country Park must be part of an integrated IGS Masterplan and clearly cannot be dependent on the timing of the Henley Gate development.

The Arboricultural Assessment hides the real number of trees to be felled and underestimates the loss of hedgerows. The EIA needs to take into account the submission made by DR D SEATON (23 Park Road, Ipswich, IP1 3SX) and the objections of Suffolk Wildlife Trust to the excessive hedgerow loss. The EIA underestimates the effects of the proposed felling of trees and hedgerows on biodiversity and habitat, which is non-compliant with CS1, CS16 and DM10 and the IGS Masterplan.

Air Quality assessment needs to take account of IBC's proposal to move to a single AQMA for the town centre. It also needs to take specific account of the proposed highway changes. The application is non-compliant with DM15b) as it fails to make a proper assessment of the impact on air quality.

Using "official" NOx emission reduction figures for Ipswich is not valid as NOx pollution is increasing in Ipswich. The new traffic light system also appears to be increasing queuing traffic at certain points thereby increasing NOx pollution in these areas. Unless air quality is improved in the proposed town centre AQMA cyclists and pedestrians are unlikely to increase due to health concerns. We are particularly concerned with the air quality impacts around St Margaret's and St Helens primary schools as the modelling shows almost stationary traffic flows in the morning. IBC must not put the health of young children at risk, as this application clearly will.

10.17 This needs to consider Network Rail's plans to increase diesel freight prior to electrification of the rail line.

Noise assessment needs to take account of Network Rail proposals to move Westerfield station and to increase frequency of freight traffic and for the proposed highway changes during the construction and operational phases. A noise assessment of the construction works associated with the provision of the foul water solution is also required.

The IBC Drainage Engineer and the Environment Agency must be fully satisfied that the proposed drainage solution /SUDS are acceptable in order to be compliant with CS1, CS17 and DM4. Recent minutes of the Development Steering Group show that the IBC Drainage Engineer has concerns with the proposed solution and that Mersea Homes/CBRE apparently is ignoring his concerns. We note that the Environment Agency has also objected to the application.

15.10 The EIA of the foul water system proposals is meaningless as it is not based on final Anglian Water proposals. Paragraph 15.43 states that "discussions are yet to be formally confirmed by Anglian Water". The EIA must fully assess the operational and construction phase impacts of the foul water system.

There does not appear to be sufficient consideration of the solution for the IGS as a whole nor an appropriate cumulative assessment. This is required in order for the Northern Fringe urban extension of Ipswich to be brought forward in a strategic and comprehensive manner and to ensure sustainable development. Full details of an IGS-wide foul water drainage solution are required in order to assess the cumulative impacts of the IGS development. This is non-compliant with the IGS Masterplan, the Core Strategy and the NPPF and hence this application is premature.

There is a major risk that a standalone foul water solution just for the Mersea Homes/CBRE site could prejudice the development of other sites on the IGS thereby preventing sustainable

development and jeopardising delivery of future housing need by IBC. This would be in breach of the NPPF, CS7 and CS10.

How this solution will cater for the Ipswich School site is a particular concern that needs to be addressed before outline consent can be given.

15.23 There is no mention of the proposed location of the storage tank(s) in the EIA although the Drainage Survey Final Report July 2014 indicates this to be on Valley Rd.

15.45/15.48 The apparent need for a 550m<sup>3</sup> storage tank on Valley Rd and sewer upsizing will have a significant impact on traffic along Henley Rd during the construction phase, which the EIA fails to assess and needs to be resubmitted accordingly. For example a 10x10x5.5m tank is likely to require closure of Valley Rd for several months. As this is the main road in Ipswich this would create severe traffic congestion and increase air pollution both locally and across Ipswich due to the knock-on effects that Ipswich is known to experience.

It would also appear that additional storage tanks and pumping stations are needed on the IGS, which need to be part of the cumulative EIA. This needs to consider an assessment of potential odour issues. Details need to be provided on the traffic impacts of the proposed solution during the construction phase, including estimates of the duration of the required roadworks and all partial/full road closures required. It is not clear if the proposed solution is adequate for the IGS as a whole – this needs to be clarified by Mersea and Anglian Water and the EIA revised accordingly and subject to further public consultation.

The EIA needs to assess the impact of relocating the gas main and HV cable running under Valley Rd.

The EIA only mentions one pumping station whereas Drainage Survey Final Report July 2014 states there are two on the Mersea Homes/CBRE site. The Cumulative EIA needs to identify whether additional pumping stations on the IGS will be required. The EIA needs to consider the carbon content of the energy required to operate these pumping stations and propose zero carbon solutions to meet energy demand in order to be sustainable. If not then the proposals are non-compliant with CS1, DM1 and DM2.

The application fails to include a birds survey and consider any mitigation needs and does not include a reptile mitigation strategy. These both need to be included and reflected in the EIA. We note that Suffolk Wildlife Trust has raised objections to the application in this respect.

- **Drainage Survey Final Report July 2014**

The Foul Water Drainage Strategy includes two pumping stations and a 550m<sup>3</sup> storage tank on Valley Rd, which are not mentioned in the EIA. There does not appear to be any consideration of the solution for the IGS as a whole nor an appropriate cumulative assessment. This is non-compliant with the IGS Masterplan and the Core Strategy. Full details of an IGS-wide foul water drainage solution are required in order to assess the cumulative impacts of the IGS development.

The phasing shown in Figure 4.1 (1A-1E) for 1A does not match phasing shown in other documents. This needs to be consistent. It does not match the phasing stated in the Transport Assessment “The development site will be developed in two main phases, with Phase 1 providing 150 dwellings and Phase 2 providing 665 dwellings.” Whilst the Planning Statement states that there are two broad phases the Design and Access Statement states there will be Phases 1-4 (including Phase 1a and 1b totalling 185 dwellings) although the accompanying diagram shows yet another different phasing -

three phases with subsets (totalling six). We also note that the phasing numbers do not match that shown in the document entitled “Proposed AW Connections”.

The Foul Water Drainage Strategy shows the new sewer running underneath the road network in Phase 1C and the Pumping Station in Phase 1B. Both will need to be completed for the initial Phase of 80 homes. A detailed planning application for Foul Water infrastructure in these areas is required as part of the initial 80 homes application. Requirements also need to be incorporated into in the Infrastructure Plan.

The “Proposed Anglian Water connections” diagram does not show proposed connections for the IGS as a whole and is non-compliant with the IGS Masterplan and CS17.

- **Energy and Sustainability Statement**

4.3 states that Materials resource efficiency will be achieved through the scale of development. The proposed foul water solution for large storage tanks is carbon intensive and not resource efficient. The embodied carbon intensity of these tanks needs to be offset in order to be sustainable.

With the omission of cycle and footpaths on the Phase 2 gyratory system, travel will be more carbon and energy intensive than indicated.

We support IBC’s targets for low carbon buildings and agree that the IGS must be the standards detailed in IBC’s CS which has been subject to independent examination and agreed to be sound. The developers stated intention just to achieve Level 3 for the scheme is non compliant and should be rejected accordingly.

The intention to provide no residential low and zero carbon technology is in breach of CS1, DM1, DM2 and the IGS Masterplan and should be rejected accordingly. We note there are many homes near to the IGS with one or more renewable technologies already installed.

Many social housing developments ensure renewable energy as a proven cost effective energy system that helps alleviate fuel poverty. We would expect a high quality development to contain renewable systems and therefore renewable energy should be an integral part of the IGS. Mersea Homes/CBRE’s positioning illustrates a complete lack of commitment to sustainable development and raises major questions whether the proposals are of high enough design quality and compliance with CS2 and DM5.

The Energy Demand assessment completely fails to take any account of the energy requirement for the AW pumping stations and needs to be revised to do so. The carbon intensity of the energy requirements of the pumping stations need to be offset by renewables in order to be sustainable and compliant with DM1 and DM2.

Micro-CHP technology needs to be included in the technology assessment.

8.3 Obviously other splits can be used.

We challenge the comments in relation to solar PV where the costs have dramatically reduced and can easily be installed, especially during new build. This is happening with many developments across England and there is no reason why it can’t be installed on the IGS. We note there are many homes around the IGS site with PV.

Any south facing non-residential building without major shading can have PV installed on a cost effective basis. There are many schools in Suffolk with PV.

- **Transport Assessment**

1.4.4 The Transport Assessment needs to demonstrate that the site access arrangements can accommodate the full and ultimate development of the IGS as a whole and not just the southern neighbourhood. Sensitivity analysis of the cumulative effects of traffic flows arising from the entire IGS development is required as requested by SCC. The current assessment is non-compliant with the IGS Masterplan and the Core Strategy.

5.3.3 This makes no reference to the outstanding application to establish an additional Public Right Of Way on the Fonnereau Village site. This needs to be taken into account by Mersea Homes/CBRE.

5.4.6 This states that the 'the topography of the area surrounding the site and Ipswich in general is conducive to cycling, and along with the existing facilities, it is considered that cycling will be an attractive mode of travel for residents / users of the development site'. Cycling within the site will certainly be a reasonable proposition but the steep hill down into Ipswich town centre makes this route suitable only for experienced cyclists with a high level of fitness. Cycling to and from work in the town centre is not likely to be a real option for the majority of residents, especially during winter months and bad weather. The ONS census cycle to work data<sup>2</sup> for Ipswich shows that in 2001 - 5.7% residents cycled to work however by 2011 this had decreased by almost 20% with just 4.6% residents cycling to work.

5.5.4 and 5 This is incorrect as Service 19/19A has now been withdrawn from Henley Road, placing it out of reach of the 400m contour. The assessment and the model need to take account of this.

Whilst the service 118/9 may be considered adequate during the morning peak-times (departures from Westerfield railway station towards Ipswich at 08:01, 08:31 and 09:11) it is not adequate for the evening peak as there is no service past 17.55 (return from Ipswich at 16:15, 17:15 and 17:55). The service is certainly not adequate during the remainder of the day for shopping and other social trips. Personal experience of our members shows that departure times heading towards the town centre can vary very considerably (+/- 10 minutes or more) due to the long and tortuous route from the origin of the service. The service is therefore not adequate for the early stages of the development as claimed in Appendix 6 paragraph 4.3.4.

The application does not take account of Network Rail's proposal to move Westerfield station and must do so. We also note that Mersea Homes/CBRE has ignored Network Rail's previous concerns resulting in a formal objection from Network Rail.

The framework travel plan (Appendix 7) refers at para 1.1.6 to '..Westgate station and beyond to Ipswich Town centre..'. 'Westgate' presumable is an error and meant to be Westerfield.

5.5.10 This incorrectly states that there are direct services from Westerfield to London.

5.5.12 Abellio the train service operator has a policy of not allowing more than four bikes on its trains due to health and safety, which is a major barrier to using the service for cyclists who are regularly prevented from boarding trains with their bikes especially at Ipswich station. Therefore as there is no guarantee of being able to board a train with a bike the assessment is incorrect in stating

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<sup>2</sup> <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-353510>

that cyclists can use the wider strategic rail service as part of a train interchange journey or as part of a linked journey using other sustainable travel modes.

5.6.3 Firm commitment needs to be given by Mersea Homes/CBRE that it will not use their land as a ransom strip for the bridge before the planning application can be approved. Without this sustainable development of the IGS cannot be guaranteed and would be in breach of the NPPF and CS17.

6.1.1 and 6.2 The simple priority junction needs to include a controlled crossing facility or underpass that allows schoolchildren to safely access the secondary school by foot and on cycle. It also needs to be on a formal cycle route otherwise the application is non-compliant with the IGS Masterplan and CS5, CS17, DM5 and DM15.

7.2.1 This states that Phase 1 provides 150 dwellings and Phase 2 providing 665 dwellings is inconsistent with other documents and with 7.2.2 which references three phases including two "Phase 3As". This needs to be made consistent across all documents. The Design and Access Statement states that Phase 1a will comprise 80 homes and Phase 1b 105 totalling 185, which is 23% higher than that modelled for Phase 1 in the transport assessment.

9.2 This section reverts back to two phases for the traffic modelling. It is not clear how the development of the Ipswich school site is included.

9.3.1 We note that "The 2021 and 2027 base assessments include only those developments and/or transport infrastructure elements that are fully committed, have planning consent and in the case of infrastructure proposals are funded and have genuine delivery timetables." However, the flows are taken from a report written March 11, 2010 so this is clearly incorrect. Appendix 10 Paragraph 2.3 outlines a different approach. This is confusing and needs to be clarified.

Mersea Homes/CBRE/Croft Transport Solutions must detail exactly what new/planned developments are included and identify those that have not been considered. Likewise for the scenarios. The submitted documents show there is a major risk that the modelling underestimates traffic flows given IBC's CS population and jobs expansion plans and does not take account of the phasing etc of other parts of the IGS.

The assessment needs to include the increased traffic associated with the expansion of St Margaret's to a 2FE primary school. It also needs to include traffic flows to the high school associated with pupils that live outside of the IGS. These appear to have been ignored.

9.4 We agree with the use of AECOM's trip rates for the Phase 1 development of 150 homes as detailed in Appendix 11 and paragraph 9.8. We also note that Croft's recreation of AECOM's trip rates regarding education and retail are higher than those used by Croft in its modelling. We believe that the modelling must use trip rates acceptable to AECOM and SCC as the highways authority and not those advocated by Croft.

Trip rates used for modelling the IGS as a whole need to be specified along with the sensitivity analysis undertaken although there appears to be little sensitivity analysis of trip rates e.g. with different levels of sustainable travel from the IGS.

9.3 and 12.1.36 Given the major flaws in the modelling approach this will not add robustness.

9.4.2 The reference to "modal shift" here is interesting. This clearly indicates that Croft expect residents to initially use their cars and that they will have to be shifted to other modes of transport.

This will take time and implies that there will be a time lag between residents moving onto the IGS and using their cars before shifting to more sustainable forms of transport. This is borne out by Paragraph 9.8 where Croft argue that an “extraordinary allowance” should be made for the long term reduction in trip rates that would occur as a result of the implementation of sustainable measures introduced as the development progresses. This is not reflected in the modelling and needs to be incorporated accordingly. The assessment fails to provide evidence that these rates of modal shift are attainable and needs to do so in order to be sound; it is not credible to model in an extraordinary allowance for the long term reduction in trip rates without evidence. We note that this does not match with the road plans to remove the dedicated cycle lanes on Valley Rd and not provide them on both sides of the Westerfield Rd gyratory system. As mentioned above, the ONS census cycle to work data for Ipswich shows a drop in cycling to work of almost 20% between 2001 and 2011. The application also fails to provide a comprehensive sustainable access and movement strategy or the outline travel plans as requested by AECOM, on behalf of Suffolk County Council, in its response to the Scoping Note. There is simply no evidence that these extraordinary rates can be achieved.

Croft need to specify how it has reflected the extraordinary sustainable travel in its modelling. If successful this will result in extraordinary numbers of cyclists and pedestrians using signalised crossing points and as such crossings will need to allow more time to enable users to cross, which in turn will slow down car journey times. If additional time is not allowed then people will not cycle or walk from the IGS. If this has not been taken into account the model is flawed either by over-predicting sustainable travel or in under-predicting car journey times and hence congestion.

We also note that there are no firm design proposals to improve the cycling network between the IGS and the town centre, without which the sustainable travel objectives will not be achieved, never mind the extraordinary levels that Croft has assumed/modelled. This is non-compliant with DM15c. Sensitivity modelling is required to assess the impacts on traffic flows if these extraordinary sustainable travel levels are not achieved.

9.3 Both the 2021 and 2027 scenarios need to include construction and tradesman traffic for the entire IGS site and other new developments. This is likely to be considerable given the multi-phase approach across the IGS. As the Mersea Homes/CBRE site is expected to be built out across a 10-15 year timescale this is extremely relevant to the scenarios. Such traffic appears to have been completely excluded, thereby underestimating traffic flows.

Both scenarios must include the full impact of additional traffic to and from the proposed schools especially as the secondary school will be taking pupils from outside of the IGS. This additional traffic, such as staff etc appears to have been under-estimated. We note that school staff are unlikely to live in the school catchment area and are unlikely to use public transport due to the books, laptops etc they need to carry.

9.4.7 The mix of dwellings as well as the numbers is important. If the lower number contains larger homes e.g. 4-bed homes compared to 1-bed flats, then the number of car trips could still be similar.

9.8.9 The sensitivity analysis needs to be carried out a) to include traffic from the Ipswich School site and b) the IGS development as a whole. The use of “Full development” is misleading and should be clarified to reflect that this is the Mersea Homes/CBRE site only.

The Tables shown in Appendix 12 are dated March 11, 2010. This would therefore ignore all trips from any developments after this date e.g. Hayhills, Colchester Rd Fire Station, Waterfront etc.

Traffic movements from all additional and planned developments must be incorporated into the analysis.

The overall result appears in Appendix 12, pages 23 and 24 and shows that around 14% of journey to work trips originating in northeast and northwest Ipswich during the morning peak terminate in the town centre. This implies that the vast majority of trips from the IGS will not be to the town centre but elsewhere. Ipswich census data shows that 38,294 people in Ipswich drive to work out of the 65,888 working people

However, the town centre has not been identified by the 2013 Suffolk Growth Strategy or the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan as a major employment growth site. The only principle employment growth site identified within the Ipswich boundary is the Futura Park/Ransomes Europark expansion, which located at the opposite end of town from the IGS. The next two nearest sites are the Former Sugar Beet Factory and Adastral Park. None of these three sites are within easy reach of the IGS site by public/sustainable transport.

Since sufficient jobs growth is unfortunately not forecast in the Town centre and as the IGS site is poorly connected to these principle sites of employment growth, then commuting by car would seem inevitable. In 2001 the net commute into Ipswich was 11,767, which has fallen dramatically to 6,171 in the 2011 census<sup>3</sup> due to more people commuting out of Ipswich to work. It is therefore not reasonable to apply the same historical percentage to trips originating in the IGS to the town centre as these trips will represent journeys to jobs that do not yet exist and are unlikely to do so. The model needs to take account of the location of the major employment growth sites around Ipswich and the increased traffic flows from the IGS to them. To ignore the location of new employment sites and assume that the majority of new jobs will be created in the town centre is simply not credible.

The matrix should be amended to show a more realistic estimate of trips to the town centre with a corresponding increase in trips to other employment sites; the models should then be modified, re-calibrated, validated and re-run.

12.1.13 states '...it is considered that the proposed development will not have a severe impact on the local highway during the 2027 AM peak period.' This is clearly a subjective assessment, which we believe falsely represents congestion levels. Croft needs to provide definitions of both 'moderate' and 'severe'.

Table 11.2, for example shows that journey times in the PM peak on Henley Road South Bound (between Valley Road and Fonnereau Road) are predicted to rise from 3.3minutes to 10.8; Anglesea Road, Berners Street SB (between Henley Road and A1156) from 4.3 to 12.0; Bond Street NB (between Star Lane and A1156) from 2.4 to 7.3; Bond Street NB (between Star Lane and A1156) from 5.9 to 17.0. Taking the table as a whole, there are nine instances where journey times on a particular link have been more than doubled and three where they have been tripled.

The resulting effect of these delays will extend the peak commute times into the warm-up and cool-down periods.

When looking at the length of these routes, the figures are even more disturbing. For instance to travel just 100 metres will take:

- 7.37 minutes on route 125

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<sup>3</sup>[www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow2&period=0&fix=E07000202&view=475.625,237.8125,78.75,79.375&tr=-136.894775390625,-184.43862915039062&sc=1](http://www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow2&period=0&fix=E07000202&view=475.625,237.8125,78.75,79.375&tr=-136.894775390625,-184.43862915039062&sc=1)

- 5.36 minutes on route 131
- 5.22 minutes on route 132
- 4.46 minutes on route 173
- 3.1 minutes on route 104.

This shows that traffic is virtually stationary. The road network will clearly be unable to handle any form of breakdown, accident, roadworks or emergency. Emergency vehicles will clearly struggle to pass through this level of congestion and will put human lives at unacceptable risk. The only possible conclusion is that Ipswich will be subject to gridlock on an almost daily basis, detrimentally impacting on business and resulting in unacceptable air pollution with detrimental health impacts. This is clearly not sustainable.

NFPG does not accept that these figures, that affect people across the whole of the north of Ipswich and beyond, are 'moderate, but that they have a 'severe impact'. We also note that the Traffic Management Officer of Suffolk Constabulary has raised concerns regarding the increased volumes of traffic.

It should be noted that these figures are based on flawed modelling that under-estimates peak flows for the reasons we have detailed above so the situation will actually be worse.

12.1.8 This statement is incorrect as the proposed highway changes to Valley Rd and the planned Westerfield RD gyratory system will not facilitate cycling. As mentioned earlier there are no firm design proposals to improve the cycling network between the IGS and the town centre, without which the sustainable travel objectives will not be achieved.

The Transport Assessment is incomplete as it fails to consider the impacts of traffic flows on the road network of the surrounding villages, most notably Westerfield, Tuddenham and Henley, which already experience traffic flows from Ipswich.

#### Appendix 6

The 'strategy' is more a wish-list than a strategy and is not supported by any form of objective economic analysis.

Traffic assessments use detailed 'trip rates' together with matrices of trip origin and destination to use as inputs to the traffic model to estimate journey times. Similar techniques should be used to model the demand for bus travel by estimating the proportion of trips that are likely to use this mode of travel; this information should then be used to produce a model of the economics of providing the proposed service. Sensitivity analysis could then be used to estimate the effect of differing journey and headway times. Without such analysis it is impossible to assess the viability of the strategy as described. We also note that it may be necessary to ensure that the developer funds any proposed new service during early stages until it reaches financial viability.

If, as suggested in Appendix 7 paragraph 4.4.3, the service 118/9 is to be extended into the development then the signalised junction on to Westerfield (shown in plan 11) will have to be re-designed to accommodate the swept area of a bus turning left to head north. This needs to be included in the proposed highway changes.

Service 19/19A has now been withdrawn from Henley Road, placing it out of reach of the 400m contour. This needs to be corrected in the assessment and reflected in the modelling.

4.3.4 Whilst the service 118/9 may be considered adequate during the morning peak-times (departures from Westerfield railway station towards Ipswich at 08:01, 08:31 and 09:11) it is not adequate for the evening peak as there is no service past 17.55 (return from Ipswich at 16:15, 17:15 and 17:55). The service is certainly not adequate during the remainder of the day for shopping and other social trips. Personal experience of our members shows that departure times heading towards the town centre can vary very considerably (+/- 10 minutes or more) due to the long and tortuous route from the origin of the service. The service is therefore not adequate for the early stages of the development as claimed and alternative solutions need to be implemented.

#### Appendix 8

There is no point in validating the original model which was fundamentally flawed as it failed to model peak GMT road traffic which will occur in winter months. The original traffic survey<sup>4</sup> was carried out between 15<sup>th</sup> and 17<sup>th</sup> July 2008 with the exception of the level crossing survey (9th July 2008) and the ATCs which ran for a continuous 3 week period between the 30th June 2008 and 21st July 2008. Currently the model only establishes summer peak am and pm flows at the time of low traffic volumes.

This period under-estimates secondary school traffic as GCSE and A level students are not in full-time attendance. More importantly Ipswich School, on Henley Rd, finished for the summer holidays in the 1<sup>st</sup> week of July so all its associated traffic, including the many coaches carrying pupils, have been omitted. Ipswich school families are also likely to be away at these times when holiday prices are lower than state school summer holiday times. Coach traffic to/from Ipswich School is known to have a negative impact on traffic flows in neighbouring roads.

People are less likely to walk and cycle in winter months when the clocks have gone back due to inclement weather and dark mornings and evenings. In the case of the IGS, there will be a substantial reduction of people walking as Christchurch Park is closed from dusk to dawn. There will also be a further reduction in people cycling as the bridleway is poorly lit, has a poor surface which gets covered with leaves from the over-hanging trees that are not regularly removed and has no "escape" routes in the event of any confrontation and is therefore unsafe.

These errors are clearly evidenced by the poor correlation between the model and the traffic surveys around Henley Rd/Valley Rd/Tuddenham Rd areas. This was previously identified as an issue by AECOM, on behalf of Suffolk County Council, in its response to the Scoping Note paragraph 5.1 'A review of the proposed residential distribution identified in the Scoping Note indicated some discrepancies when compared to analysis presented in the Northern Fringe Transport Strategy. In particular, a lower proportion of trips are identified to pass through the Valley Road/ Henley Road and Colchester Road/ Tuddenham Road junctions than may be anticipated. Further details are therefore requested to support the trip distribution identified in the Scoping'. This has been ignored by Mersea Homes/CBRE/Croft and needs to be addressed.

July is clearly not a neutral month to undertake a traffic survey. The model will need to be re-calibrated and re-run accordingly. This will require additional traffic monitoring in winter months after the clock change to establish peak am and pm flows.

2.4.2 The specific dates of the July 2013, Sept 2013 and November 2013 traffic surveys need to be stated in order to properly consider the results. The methodology for the use of this data in conjunction with the previous data needs to be clearly specified. For instance how the trip times etc are derived. The use of the September data relative to the July data needs to be clearly defined. All

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<sup>4</sup> Paragraph 5.2 Transport Assessment, June 2009.

traffic survey data needs to be made available as part of the consultation process. Currently there is insufficient information to undertake a proper traffic consultation and assessment of the Mersea Homes/CBRE application.

Unbelievably, the journey time survey routes do not include Westerfield Rd, which is the only access point to/from the application site. This is a major omission that needs to be rectified. The EIA needs to assess the sensitivity and severity of the traffic impacts on the roads nearest to the IGS rather than average the impact on flows across the modelled area. This should be based on Tuddenham Rd, Westerfield Rd, Henley Rd and Valley Rd. The model must be correlated with traffic surveys on these areas as they are the ones that will be affected most.

2.7.2 This is factually incorrect. There have been major changes since 2008. These need to be incorporated into the model if not already done so.

2.6.5 The model also needs to incorporate changes to bus routes and frequencies e.g. curtailment of Dales/Crofts bus service. A full list of updates must be provided so that the accuracy of this can be confirmed.

The peak hour light vehicle calibration results show an average GEH figure less than 5 for 89.5% of measured points during both morning and evening peaks which exceeds the design manual for roads and bridges (DMRB) recommended satisfactory figure of 85%.

The average value, however, conceals the spread of results at measured points and it is clear that the model significantly underestimates the count at several of the most relevant and sensitive points to the IGS. For example at measuring points 7, 8 and 9 on Henley Road, Westerfield Road and Tuddenham Road respectively<sup>5</sup>. This could result in over-optimistic calculated journey time results for those routes.

Whilst the average of predicted journey times on the four routes (A, B, C and D in figure 3) lies within 15% of measured results, Tables 5 and 6 show that show that the Model generally under predicts traffic compared to survey. Again, there is a large distribution with the model significantly under-estimating times for route B Green SB AM (-25%) & PM (-13.5%) along Tuddenham Rd and route C Red EB along Valley Rd as well as route D Orange EB.

The averaging approach used by Croft hides that the model fails accuracy/calibration tests in relation to the routes that traffic from the IGS will use. The model is clearly inaccurate in relation to the IGS and must be re-calibrated to reduce the spread, paying particular attention to areas where congestion is already predicted to be high, then re-validated and re-run.

This clearly shows that the model is poorly calibrated in the area around the IGS and especially Tuddenham Rd. The absence of traffic survey data for Westerfield Rd is unacceptable.

We note that the modelling assumes that the IGS Travel Plan is fully and successfully implemented with extraordinary levels of sustainable travel never seen before in Ipswich. Sensitivity modelling is required to show the impact on traffic with lower rates of sustainable travel.

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<sup>5</sup> Poor fits are Table 1 AM peak LV: WYGIPS07SB, 08NB, 09NB, 19EB; Table 2 AM peak HV: WYGIPS14WB; Table 3 PM peak LV: WYGIPS07NB, 08NB, 14EB, 14WB; Table 4 PM peak HV: WYGIPS14WB,14EB, 15WB where 7=Henley Rd, 8=Westerfield Rd, 9= Tuddenham Rd, 14=Crown Street, 15 =Woodbridge Rd / Argyle Rd.

Table 11.2 This shows the pm rush hour additional delays over the reference case of 4min/km. If you multiply the link length by the delay/km to get the link delay, Norwich Rd to Henley Rd rises from 5.8min to 15.5 min and Argyle St to St Margaret's Plain via St Helens Street by 5.9 to 17 min.

4. Conclusion - This must identify the flaws in the model and the major differences in the IGS between the model and the survey data. It is impossible to have sufficient confidence in the model in relation to the IGS area without better and additional modelling and sensitivity analysis.

#### Appendix 9

Queue lengths not validated. There is no justification as to why the modellers thought it was better not to change these. We believe they should be validated as a stress test for the modelling.

#### Appendix 10

Scenario 1a – 150 buildings forecast year 2021. This does not fit with the proposed Mersea Homes/CBRE build rates or the multi-site build approach across the Northern Fringe. The 2021 scenarios need to be re-run to reflect the proposed build rates.

The model needs to fully assess the cumulative effects of the IGS and undertake sensitivity analysis. This needs to include the additional construction traffic associated with all proposed new developments.

2.3.3 The Four Model Zones; 'Town Centre', 'Inner Area', 'Suburban' and 'External' need to be defined here. The rationale for adopting the same rates for the latter two zones needs to be explained.

Paragraph 2.5.2 There are other additional planned highway changes that have been ignored as detailed on the Travel Ipswich website. For example proposed changes to Majors/Mulberry Corner, Norwich Road double roundabouts and Henley Rd/Dales Hall Lane junctions with Valley Rd. These will all be affected by IGS traffic. The proposed lane re-alignment and allocation changes at the Henley Rd/Valley Rd junction to improve pedestrian/cycle access due to take place October 2014 are inconsistent with the Mersea Homes/CBRE proposals that will make cycling more difficult than it already is. Traffic flows need to reflect these proposals and Mersea Homes/CBRE needs to revisit its proposed changes to the Henley Rd/Valley Rd junction accordingly.

We note that analysis of the traffic flows again indicates that in both the 2021 and 2027 reference cases these links are already at or exceeding capacity.

#### Appendix 11

We agree with the use of AECOM's trip rates for the Phase 1 development of 150 homes.

We note that Croft's recreation of AECOM's trip rates regarding education and retail are higher than those used by Croft in its modelling. We believe that the modelling must use trip rates acceptable to AECOM and SCC as the highways authority and not those advocated by Croft.

#### Appendix 12

The report is dated 11 March, 2010. This needs to be revised to take account of the current situation in net commuting to/from Ipswich. In 2001 this was 11,767, which had dropped to 6,171 in the 2011 census<sup>6</sup>. This needs to be taken into account in the traffic modelling.

This would therefore appear to ignore all trips from any developments after this date e.g. Hayhills, Colchester Rd Fire Station, Waterfront etc. Traffic movements from all additional and planned developments must be incorporated into the trip rate analysis.

We note that the IGS is spread across sectors 1, 2 and 7 and that trips outside of the Ipswich area are omitted. Does this imply that trips from the IGS north of the railway line to places outside of Ipswich are omitted?

Why is Kesgrave included as part of Ipswich?

#### Appendix 14

This appears to under-estimate the traffic that will seek to travel to/from the A12 (either by Claydon or at Woodbridge) and to travel through Bealings to Martlesham Heath. Residents of the IGS will use these routes rather than via the A1214.

- **Arboricultural Assessment**

The approach of grouping trees together, as groups, areas, woods, hides the real number of trees to be felled and underestimates the loss of hedgerows. The assessment must detail include a total for the number of trees to be felled. We believe that too many trees and hedgerows are to be felled with too great a loss of biodiversity and habitat that is in breach of CS1, CS16 and DM10 and the IGS Masterplan. The submission made by DR D SEATON (23 Park Road, Ipswich, IP1 3SX) clearly shows this and needs to be taken into account. We note that Suffolk Wildlife Trust has also objected to the excessive hedgerow loss.

The Arboricultural Assessment assumes that there will be no tree felling required for junction improvement etc around Valley Rd, which appears to be inconsistent with Mersea Homes/CBRE's highway plans. The proposed changes to Henley Road, with the felling of trees are in breach of the draft Urban Character SPD for the Parks area.

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<sup>6</sup>[www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow2&period=0&fix=E07000202&view=475.625,237.8125,78.75,79.375&tr=-136.894775390625,-184.43862915039062&sc=1](http://www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow2&period=0&fix=E07000202&view=475.625,237.8125,78.75,79.375&tr=-136.894775390625,-184.43862915039062&sc=1)