Our Ref: SCC/CON/1093/24
Date: 24 May 2024
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Suffolk County Council

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For the attention of: Rosalynn Claxton

Dear Rosalynn Claxton

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: IP/24/00172/OUTFL

PROPOSAL: Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATON AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).

LOCATION: Land Between Humber Doucy Lane And Tuddenham Lane Humber Doucy Lane

Suffolk County Council (SCC) in its capacity of the Local Highway Authority recommends that a **Holding Objection** is upheld until the information presented within this consultation response has been submitted for review, in the interest of ensuring that the impacts to the local highway network are suitably assessed and to ensure that opportunities to promote walking, cycling and public transport use are identified and pursued, in accordance with national and local policy requirements.

ACCESS AND ACCESSIBILITY CONSIDERATION:

The proposed site is severed by the existing rugby club on Humber Doucy Lane and subsequently, there are initial concerns around permeability and connectivity within the site which should be considered by the Local Planning Authority. For the purpose of this consultation response, the section of the site situated west of the rugby club will be referred to as the 'western parcel' and the section of the site situated east of the rugby club will be referred to as the 'eastern parcel'.

A segregated walking and cycling facility has been proposed within the site boundary on the northern side of Humber Doucy Lane, for both the eastern and western parcels. The route transitions into a shared use facility on the southern side of Humber Doucy Lane, between the junction of Sidegate Lane to the proposed parallel crossing west of Ayr Road. Consideration should be given to the feasibility of providing a continuous route on the northern side of Humber Doucy Lane to accord with the LTN 1/20 principles of directness and coherence and to ensure compliance with policies outlined within Section 9 National Planning Policy Framework 2023 (NPPF) and Local Plans. This is of particular importance given that it is anticipated that this route would provide connectivity for residents on the eastern parcel to the early years facility and non-residential uses associated with the western parcel.

In terms of vehicular access, the development proposes to provide access from Humber Doucy Lane and Tuddenham Road; with a signalised junction proposed opposite Inverness Road, a priority (bus only) access opposite Sidegate Lane and a priority junction from Tuddenham Road to serve the western parcel, as well as a priority junction from Humber Doucy Lane to serve the eastern parcel.

In terms of the western parcel, it is understood that the access serving the existing rugby club constrains the potential to provide the main signalised site access at the junction of Sidegate Lane, as opposed to the junction of Inverness Road, of which is currently proposed. Incorporation of the rugby club would enable the opportunity to relocate the existing access to be served through the infrastructure associated with the development site and subsequently, permanently stop-up the existing rugby club access from Humber Doucy Lane and provide the main site access opposite Sidegate Lane.

SCC as Local Highway Authority considers that the main site access would be better served opposite Sidegate Lane as it would provide more direct accessibility to the A1214 corridor and reduce the likely intensification of Inverness Road resultant of the current proposal to provide a signalised access opposite Inverness Road.

Furthermore, positioning the signalised site access opposite Sidegate Lane would reduce convenience of motorists routing towards Tuddenham and to Church Lane which provides and alternative route to the A1214 corridor for vehicles traveling west.

Further justification should be provided as to why the above approach has not been taken to maximise site accessibility and permeability for active travel modes. This will include the need to provide evidence that attempts have been made to approach the rugby club and incorporate land within the development.

PROPOSED ACCESSES:

The comments above relate to recommendations which are considered to improve the development proposal and the following comments relate to the access proposals as currently proposed with this planning consultation. It should be recognised that the preference for site access remains to be in line with the recommendations above, in the interest of maximising accessibility and connectivity and prioritising active modes of travel, in accordance with local and national planning policies.

Site access – bus only (opposite Sidegate Lane):

It is noted that a bus-only access is proposed from Humber Doucy Lane, opposite Sidegate Lane. It is recognised that this is within close proximity to the access serving the Ipswich Rugby Club and while the preference would be for the rugby Club access to be altered to be served from the internal spine road associated with this development, concerns relating to potential conflict between the two access points would be mitigated if the bus-only access into the site was designed as an ‘in-only’ arrangement. This would require bus penetration into the site from the bus-only access, with egress for busses being achieved from the main vehicular access opposite Inverness Road.

The bus-only access should be designed with a width of 3.25m, to accommodate one-way movement, and a radius as close to 6.0m as possible (dependant on vehicle tracking). Vehicle tracking for busses should be submitted to demonstrate that access proposals will accommodate bus movements from each of the relevant accesses.

It is recognised that there is a proposal to provide a parallel crossing west of the bus-only access. This is supported as it is likely to form part of a key desire line; however, it should be noted that these crossings will require lighting and, in some locations, such as the crossing west of Ayr Road, this may require further removal of vegetation.

Site access – signalised junction (opposite Inverness Road):

A signalised junction has been proposed opposite Inverness Road – of which is presented within submitted Drawing Number 890695 RSK ZZ XX DR C 0003 Revision P02. It has not been evidenced that a suitable signalised junction design can be delivered at this location. Initial comments have been received from the Suffolk Highways Traffic Signals team in relation to the design proposal, of which are included below.

- Forward visibility splays should be provided for the signal heads on each approach. Basic forward visibility splays are 40m where 85th percentile speeds are 30mph and 52m where 85th percentile speeds are 40mph.

- Confirmation should be provided that there is no intention to provide push buttons within the proposed island – this should be a straight over crossing point.

- It appears that the proposed crossing point is to accommodate walking and cycling and should be designed with a width of 4.0m, as standard. Further consideration also needs to be given to what the walking and cycling crossing point connects to, given that it appears to connect to existing footway provision on Inverness Road.

- Tactile paving should be to the back-edge of the footway on the north-west side of the crossing.

Consideration needs to be given to ongoing connections for pedestrians and cyclists from this junction. As alluded to above, the proposed pedestrian and cycle crossing appears to lead into existing footway provision, with no transition for cyclists to join Inverness Road.

Consideration must be given to the potential impacts to Inverness Road afforded by the proposal to situate the main site access at the junction of Inverness Road and Humber Doucy Lane. It is anticipated that this will increase vehicle trips on Inverness Road for flows distributing to and from Sidegate Lane. Mitigation will likely be required to minimise these flows, given that Inverness Road should not be relied upon to facilitate the development.

Site access – priority junction (Tuddenham Road):

Section 5.3.1.3 of the submitted Transport Assessment outlines that "*the design of the accesses ensures that intervisibility is provided between drivers, pedestrians and cyclists, offering pedestrian priority and suitable visibility splays for vehicles emerging onto Tuddenham Road and Humber Doucy Lane*". Visibility splays for the junction onto Tuddenham Road have been proposed with an X-Value of 2.4m, and Y-Values of 43m for northbound traffic and 136m for southbound traffic, as per submitted Drawing Number 890695 RSK ZZ ZZ DR C 0002 Revision P02.

The proposed 136m northbound Y-Value appears reasonable on the basis that it would accommodate 85th percentile speeds of 47.2mph. However, SCC would be seeking a contribution to fund an extension to the existing 30mph speed limit further north, to ensure that the access junction is situated within the 30mph zone.

The proposed 43m southbound Y-Value appears low when considering the 85th percentile speed data available to SCC. The data shows 85th percentile speeds close to 40mph, which would require a Y-Value of 82m. This appears achievable within the redline boundary and highway boundary; however, the plan should be amended to demonstrate this.

It appears that a 2.0m footway has been proposed adjacent to each side of the proposed access. A 3.0m shared use facility will be required to provide cycle accessibility into the site. Currently, the proposed 2.0m footways appear to terminate in advance of Tuddenham Road and further consideration should be given to a suitable transition point.

It is noted that the land accessed from Tuddenham Road – parcel D on the submitted Parameter Plans – does not include cycle infrastructure, as per the submitted Cycle Movement Parameter Plan (Drawing Number HDL-PRP-XX-XX-DR-A-08206 REV P02). Cycle infrastructure will be expected to link into the strategic walking and cycling network south of the Public Right of Way and the Parameter Plan should be revised to illustrate this.

Site access – priority junction (Humber Doucy Lane eastern parcel):

SCC supports the proposal to design the proposed walking and cycling route so that it naturally sets-back into the site to retain a 10m clearance between the facility and the nearside edge of Humber Doucy Lane, while retaining the desire line. However, the access arrangement should be revised with the walking and cycling facility maintaining a continuous level, like Figure 10.15 of LTN 1/20.

It does not appear that cycling routes have been proposed for Parcels E1 and E2 and subsequently, the proposed access does not offer a cycling facility into the development site. Further consideration should be given to how the layout will be designed to suitably accommodate cycling and whether the proposed site access should be designed with a cycle facility incorporated.

While the proposed segregated walking and cycling route is shown to terminate just before Seven Cottages Lane and rejoin Humber Doucy Lane, it does not appear that consideration has been given to the provision of a suitable transition. Further details of the proposed transition should be provided. It would also be beneficial to provide a suitable connection from this point onto Seven Cottages Lane itself, given that it is a Quiet Lane and will offer a suitable onward route for walking and cycling on Tuddenham Lane and Lamberts Lane.

There is an existing bus stop on Humber Doucy Lane near Seven Cottages Lane, near to the connection to the proposed walking and cycling facility. This should be included within the details submitted for the transition onto Humber Doucy Lane and should be upgraded to include a bus shelter and raised DDA compliant kerbing. This stop serves Route Number 59 and will provide future residents accessibility to the route between Ipswich Town Centre and Little Bealings. Details can be shown indicatively at this stage to ensure sufficient space is provided within proposals and further details can be secured via a suitable planning condition.

Based on Google Maps, the Local Centre on Selkirk Road is approximately 0.4 miles from the Public Right of Way (PRoW) between Parcels E1 and E2 (Footpath 48) via Kinross Road, Roxburgh Road and Renfrew Road. This is likely to attract walking and cycling trips and subsequently, a suitable crossing point should be provided at this location on Humber Doucy Lane to provide a direct connection to the route from the PRoW. Furthermore, consideration should be given to the interaction between the proposed walking and cycling facility and the PRoW, given that the walking and cycling facility is proposed to cross the PRoW.

Information relating to the upgrade of Footpath 48 – and other PRoW's – are included under section "*Public Rights of Way Enhancements*" of this consultation response. This should be considered in conjunction with the crossing point on Humber Doucy Lane referred to within the previous paragraph.

A separate cycle track should be provided adjacent to Footpath 48 which will provide cycle permeability central to the site. Currently, there is a lack of pedestrian and cycle access proposed for the eastern site parcel and the introduction of a suitable access point, crossing on Humber Doucy Lane, PRoW improvements (Footpath 48) and central cycle track will provide a central access point and enhance overall site accessibility and permeability.

Proposed walking and cycling facility and Crossings:

Parallel crossings have been proposed on Humber Doucy Lane and as outlined above a further crossing facility should be considered to connect to existing Footpath 48. Information relating to traffic speeds should be provided to be assessed in conjunction with potential crossings.

TRANSPORT ASSESSMENT:

TRIP DISTRIBUTION:

SCC engaged throughout the pre-application discussions associated with this application and outlined a clear expectation for the Suffolk County Transport Model (SCTM) to be used determine anticipated trip distribution. This was considered necessary given the scale of the development and the routing options within the vicinity of the site.

It remains the Highway Authority's position that the SCTM should be used to assess potential trip distribution from the site, when considering the potential for future residents to utilise Main Road, Church Lane, Lower Road and other alternatives to the A1214 corridor south of the site.

It is understood that the applicant has requested model outputs from the SCTM which can be used for assessment purposes. This will include outputs associated with the Base Year, as well as the Future Year scenario, inclusive of committed development. This information should be submitted for review as part of the Transport Assessment associated with this development proposal.

As per Section 6.5 of the submitted Transport Assessment – March 2024 – 2011 travel to work Census data was used alongside Google Maps as a basis for trip distribution. Upon a review of the submitted Trip Assignment Diagram included within Appendix 13, it is apparent that most of the routing will be towards Ipswich, with minimal movements anticipated to route towards Tuddenham. The SCTM will provide a useful comparison for these assumptions. Furthermore, routing north of Access One (Tuddenham Road access) is limited to a straight-ahead movement to Tuddenham and does not assess potential movements on Church Lane, Westerfield Road and Lower Road, of which offer an alternative route option for westbound movements to the A1214 corridor. The SCTM should be used to assess potential distribution on these routes.

TRIP GENERATION:

It does not appear that the trip generation forecasts presented within Table 6.2 of the submitted Transport Assessment correlate with the trips presented within the submitted Traffic Flow Diagrams (Appendix 14). This requires further consideration given that it could lead to understated flows within the submitted junction modelling.

Further information relating to how trip generation was split amongst the separate site accesses should be provided. Based on the trips illustrated within the submitted Traffic Flow Diagrams, the following proportions have been modelled:

- Access One (Tuddenham Road): 8% - 53 dwellings.
- Access Two (Humber Doucy Lane – western access): 82% - 541 dwellings.
- Access Three (Humber Doucy Lane – eastern access): 10% - 66 dwellings.

The submitted Transport Assessment provides an assessment of multi-modal trips; however, the information is limited to peak times. Trip rates for active and sustainable travel should be extracted from the TRICS outputs and presented as a total day number.

Trip generation has been submitted for the residential use of the site; however, it does not appear that trip generation has been established for the proposed Early Years use. It is anticipated that the Early Years provision will serve the development site itself and subsequently, trips will be self-contained. The trip rates are accepted on this basis.

JUNCTION MODELLING:

Further junctions may require detailed modelling and reviewing following the outputs generated by the SCTM and alterations may be required to the models. The modelling associated with Access Two should consider the junction with Inverness Road open to motorised traffic and with Inverness Road closed to motorised traffic, in the event this arm of the junction is stopped-up to facilitate the development (see section '*Site access – signalised junction (opposite Inverness Road)*' within this consultation response).

The Origin-Destination model inputs for each of the junction models should be reviewed as they do not appear to correlate with the submitted Traffic Flow Diagrams. As an example, for the Tuddenham Road / Colchester Road / Valley Road roundabout, full build-out with committed development scenario, the Flow Diagrams show an ahead movement from Colchester Road to Valley Road of 1,030 during the PM peak. When looking at the inputted model data, it appears this movement has been inputted as from Tuddenham Road (NB) to Tuddenham Road (SB). There are numerous examples of this and it is advised that each of the models are reassessed.

The submitted traffic modelling includes trips associated with committed development. The committed developments included within these trips should be stated and links provided to the associated Transport Assessments where the trips were extracted from. Individual flow diagrams associated with each committed development should also be provided. Ipswich Borough Council and East Suffolk Council – in their capacity of Local Planning Authority – should review the committed development and confirm they are satisfied.

It is recognised that the applicant has requested data from the SCTM, of which includes an assessment of committed development. The outputs from this exercise may satisfy the information requested within the previous paragraph, provided the Local Planning Authorities are content with the committed development sites utilised within the assessment.

Details of the junction geometry plans should be submitted for review to demonstrate how the inputted junction geometries were determined.

The Traffic Profiles associated with the submitted junction modelling have been run on a flat profile which requires further justification given the potential for flows to vary across the peak hours.

ACCIDENT DATA ANALYSIS:

Accident data has been provided within the proximity of the site for a 5-year period between 2018 and 2022. Data should be provided for a 7-year period between 2016 and 2024, to ensure up-to-date data is provided and to account for COVID-19. Upon an initial review of Crashmap, it appears that two additional 'slight' accidents are recorded on Humber Doucy Lane; west of Seven Cottages Lane and at the junction of Ayr Road, in addition to a 'serious' accident west of Inverness Road. The detailed report should be submitted for consideration.

A1214 AND TUDDENHAM ROAD ROUNDABOUT PROPOSAL:

Appendix 16 provides details of a proposed improvements scheme to the A1214 and Tuddenham Road roundabout junction, of which has been taken through submissions associated with the Ipswich Garden Suburb. It should be acknowledged that SCC will expect a design which better facilitates walking and cycling for nay works required at this junction. This is an important improvement for this scheme given the need to provide walking and cycling accessibility between the site and the Ipswich Garden Suburb (particularly for education facilities) and Ipswich Town Centre.

SUSTAINABLE AND ACTIVE TRAVEL:

Section 9 of the NPPF includes a range of paragraphs which emphasise the importance of ensuring that transport issues are considered from the earliest stages of development proposals to ensure that opportunities to promote walking, cycling and public transport use are identified and pursued, with priority given to pedestrian and cycle movements, both within the scheme and neighbouring areas, and to facilitating access to high quality public transportation.

Paragraph 114 (a) of the NPPF states that when assessing new applications for development it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up. Paragraph 114 (b) of the NPPF outlines that new development should provide safe and suitable access to the site for all users.

Paragraph 116 (b) of the NPPF states that "*development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use*".

Policy DM21 of Ipswich Borough Council's (IBC's) Local Plan (adopted March 2022) outlines a range of requirements in the interest of promoting sustainable growth in Ipswich and reducing the impact of traffic congestion on the network. The policy sets a clear expectation for development to:

e) prioritise available options to enable and support travel on foot, by bicycle or public transport.
f) have safe and convenient access to public transport within 400m, and facilitate its use through the provision or contributions towards services or infrastructure.
h) ensure safe and suitable access for all users, including people with disabilities and reduced mobility.
k) contribute as required to other mitigation measures identified through Policy CS20 and the ISPA Transport Mitigation Strategy.

Policy ISPA4.1 of IBC's Local Plan outlines that development on this land will be expected to comply with the following transport measures:

- highway and junction improvements on Humber Doucy Lane and Tuddenham Road;
- walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;
- public transport enhancements; and
- appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy;

Policy SCLP7.1 of the East Suffolk (Suffolk Coastal) Local Plan states that development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities, proceeding to outline that development proposals will be supported where:

c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken.
e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking.
g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety.

Policy SCLP7.1 also specifies that development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth and that opportunities to improve provision of or access to public transport, in rural and urban areas will be supported.

Policy SCLP12.24 of East Suffolk's local Plan acknowledges that transport modelling indicates capacity issues on the local highway network close to the site and specifies that a robust package of measures to promote sustainable transport is expected for any development proposal to mitigate any impacts on the surrounding road network.

OFF-SITE SUSTAINABLE AND ACTIVE TRAVEL:

Section 4 of the submitted Transport Assessment provides a general overview of accessibility to the site. The Pedestrian accessibility audit – Section 4.2 – discusses a variety of walking routes in the proximity of the development site; however, it fails to recommend what improvements could be made to existing infrastructure which will form part of the key movement corridors for pedestrians. Further consideration should be given to the key desire lines between the site and destinations and facilities in conjunction with the audit to establish off-site improvements necessary to enable safe and suitable pedestrian movement to and from the development site.

Like the comments relating to pedestrian movement above, little consideration has been given to off-site infrastructure requirements to accommodate cycling. Throughout pre-application discussions Sidegate Lane was discussed as a key corridor for walking and cycling movement, providing accessibility to Northgate High School, the A1214 corridor and destinations thereafter, such as infrastructure associated with the Ipswich Garden Suburb and Ipswich Town Centre, of which was identified as a key destination for sustainable travel requirements within the Local Plan.

A key requirement is to provide safe and suitable walking and cycling connectivity between the development site and the educational facilities within the Ipswich Garden Suburb, given concerns associated with limited capacity for schools closest to the development site.

A detailed plan showing walking and cycling improvements on Sidegate Lane must be submitted for consideration. This is vital as it will provide accessibility to the site and connect into the on-site walking and cycling infrastructure. It should be noted that based on surveyed traffic flows on Sidegate Lane, on-carriageway cycling (mixed traffic) is considered *"provision suitable for few people and will exclude most potential users and/or have safety concerns*" in terms of LTN 1/20 (Figure 4.1). Therefore, it is evident that improvements are required on Sidegate Lane to accommodate off-carriageway cycling.

To summarise the above in terms of walking and cycling, while proposals demonstrate that consideration has been given to the provision of walking and cycling access to the proposed development site, it is not evident that efforts have been made to promote and prioritise walking and cycling off-site within neighbouring areas – or to ensure safe and suitable access to the site for all users – contrary to the local and national policy requirements outlined above. An off-site walking and cycling strategy should be developed and improvements recommended to ensure safe and suitable movement for pedestrians and cyclists and to maximise accessibility to sustainable modes of travel.

It is anticipated that a planning obligation will be sought to extend existing bus service(s) within the area to accommodate the new development site, and SCC is currently in discussion with the relevant bus operators. It is recognised that a bus-only access has been proposed from Humber Doucy Lane to serve the eastern section of the site, with the internal road network intended to allow for busses to penetrate the site and rejoin Humber Doucy Lane. This approach is supported, and consideration will need to be given to the walking routes within the site to enable suitable accessibility to bus infrastructure for future residents. Consideration will be given to Table 2 of the Suffolk Design: Streets Guide when reviewing actual walking distances to bus infrastructure.

PUBLIC RIGHTS OF WAY (PRoW) ENHANCEMENTS:

- **Footpath 45:** Consideration will need to be given to the waling and cycling connection which crosses Footpath 45. This connection will be essential to ensure that all areas of the site have access to the proposed strategic walking and cycling corridor.

  Consideration will need to be given to the surfacing of Footpath 45 and any necessary improvements required to facilitate increased footfall. The SCC PRoW has confirmed they will be undertaking a site visit to determine necessary improvements.

- **Footpath 49:** Consideration will need to be given to the surfacing of Footpath 49 and any necessary improvements required to facilitate increased footfall. The SCC PRoW has confirmed they will be undertaking a site visit to determine necessary improvements.

- **Footpath 48:** Consideration will need to be given to the interaction between Footpath 48 and the proposed east-west segregated walking and cycling facility. Consideration should be given to the access on Humber Doucy Lane. As alluded to elsewhere within this consultation response, consideration should be given to linking Footpath 48 to a new crossing facility on Humber Doucy Lane and it may be that the footpath is directed onto the proposed walking and cycling facility to accommodate suitable access onto Humber Doucy Lane. The provision of a cycle track adjacent the current footpath would also provide connectivity for cyclists, without the need to change the status of Footpath 48 which continues north outside the development site.

  Consideration will need to be given to the surfacing of Footpath 48 and any necessary improvements required to facilitate increased footfall. The SCC PRoW has confirmed they will be undertaking a site visit to determine necessary improvements.

INTERNAL LAYOUT:

Improvements should be made to the walking and cycling links internally within the site illustrated within the submitted Pedestrian and Cycle Parameter Plans (Drawing Numbers HDL-PRP-XX-XX-DR-A-08205 REV P03 and HDL-PRP-XX-XX-DR-A-08206 REV P02 respectively).

As discussed at pre-application stage, while it has been shown to provide cycle facilities adjacent to the proposed spine road, a more direct option for much of the site would be to continue the proposed walking and cycling facility from the bus-only access opposite Sidegate Lane throughout the middle of the site in a north-westerly direction, to provide direct permeability for parcels B1, C and D as referenced on the Parameter Plans. Consideration would need to be given to cycle infrastructure for other parcels too, but this could be accommodated through shared use along sections of the proposed spine road, on the basis that a direct segregated route is provided centrally.

Consideration will need to be given to the walking and cycling infrastructure proposed to cross existing Footpath 45 and the proposed recreational route just north of the spine road illustrated within the Illustrative Landscape Strategy. The preference should be to continue the fully segregated route up to the land parcel north of Footpath 47 (parcel D within the Parameter Plans).

TRAVEL PLAN (NOT PART OF THE HOLDING OBJECTION):

A separate Travel Plan will be required for the proposed residential use and the early years facility. The Travel Plans will be required to be submitted six months prior to first occupation of the residential element of the development and six months prior to the early years use. Suitable Travel Plan condition(s) will be included within any recommendation of approval of this application.

PLANNING OBLIGATIONS:

TRAVEL PLAN CONTRIBUTION:

A planning obligation will be required to fund the ongoing monitoring of the Travel Plans associated with the site.

PASSENGER TRANSPORT CONTRIBUTION:

It is anticipated that a planning obligation will be required to fund the extension of a local bus service (or bus services) within the proximity of the site to provide an on-site bus service, in the interest of facilitating access to high quality public transport within the layout of the site in line with local and national policy requirements.

PUBLIC RIGHTS OF WAY CONTRIBUTION:

It is anticipated that a planning obligation will be sought to fund improvements to the existing PRoW network within the development site.

TRAFFIC REGULATION ORDER CONTRIBUTION:

It is anticipated that a planning obligation will be sought to fund an extension to the existing 30mph speed limit on Tuddenham Road further north, to ensure that the access junction is situated within the 30mph zone.

IPSWICH STRATEGIC PLANNING AREA (ISPA) CONTRIBUTION:

It is anticipated that a planning obligation will be requested to contribute towards the ISPA Transport Mitigation Strategy. Policy DM21 (k) of Ipswich Borough Council's Local Plan outlines that to promote sustainable growth in Ipswich and reduce the impact of traffic congestion, developments shall contribute as required to the ISPA Transport Mitigation Strategy.

Evidence shows that growth across the ISPA would cause a severe, cumulative impact on the function of the highway network within Ipswich and on the strategic highway network around Ipswich. Significant shift towards sustainable modes of transport is required to avoid severe, cumulative traffic impacts.

The ISPA Transport Mitigation Strategy is around maximising the potential for vehicular trip suppression and encouraging steps to prioritise healthy and sustainable travel. Walking and cycling are considered key sustainable transport modes that can be effective options for short journeys and the provision of suitable infrastructure can be a factor in achieving modal shift to these modes.

Yours sincerely,

Luke Cantwell-Forbes
Principal Transport Development Planner
Growth, Highways and Infrastructure