



Save Our Country Space SOCS

Planning Inspectorate Appeal for: 24/00172/OUTFL – ‘Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane, Ipswich, Suffolk’
IBC appeal reference: APP/R3515/W/24/3350674

Issues which we wish to raise with Inspectorate since our submission April 24th 2024;

1. Transport Assessment by consultant; Highways safety, Sustainable Transport requirements NPPF
2. **Environmental Impact Assessment (EIA)** not conducted. We say it should be.
3. **Revised Health Impact Assessment (HIA) required** due to recent announcement of collapse of 2017 programmed GP provision (Cardinal Practice replacement) – latest up to date figures for GP cover and oversubscription to be secure by FOI for **Suffolk NE Essex Integrated Care Service (SNEEICS)**.
4. **Suffolk NE Essex Integrated Care Service** latest **Section 106** or **CIL** contribution calculation?
5. **Food Security issue/Spanish flood/ farming crisis in UK-** This is grade **2 and 3 ‘Best and most Versatile’** agricultural land.
6. **Essex & Suffolk Water (ESW) has a water shortage** policy (in place for the Hartismere Water Resource Zone), which affects businesses that use large amounts of water. The policy has been in place since about 12 months and is scheduled to last until 2032.
East Anglia The Environment Agency has identified East Anglia as a Serious Water Stressed Area. They forecast that there won't be enough water to meet demand over the next 25 years
7. This Application is premature and outside the programmed Local Plan allocated time line and hierarchy, agreed by Inspectorate in 2022 Adopted Local plan and not required before (2032).

Transport Assessment by consultant

We would like to make additional comments in relation to the Transport Assessment for the planning application associated with this appeal.

This application traffic study ‘Transport Assessment Part 1’ highlights that there are existing roads which are either already at capacity (J12) or will be operating in excess of capacity in the near future (J11) – even without the additional traffic generated from this proposed development.

Some parts of the ‘Pedestrian accessibility audit study area’ along the north of Humber Doucy and Tuddenham Road (approx 1km combined) would be without pavements, footpaths, street lighting and clearly unsafe and hazardous for pedestrians leaving this site from the north-west.

There appears to be a presumption in parts of this application and report that the necessary road and pedestrian improvements can be achieved, without the specific details on how this would be done. The proposed designs are not acceptable. For a development of this size, road improvements must be planned and agreed ahead of permission being granted. There also appear to be errors/inconsistencies in the capacity thresholds used and statements made on future capacity for some junctions. As such some of the conclusions reached in the Transport Assessment appear to be unsound.

We also suggest it may not be possible or practical to improve the road network in some places, due to physical constraints on the available land. Other mitigating measures, such as alternative means of transport might not be sufficient and would need to be defined and modelled. Stationary traffic causes pollution, which is legally recognised both in the UK and internationally as a serious health issue and which must be recognised and solutions found at the planning stage.

UK traffic pollution recognised in landmark legal cases

‘UK government failing legal duty on air pollution, supreme court rules’ – 1/5/2013

<https://www.theguardian.com/environment/2013/may/01/government-pollution-supreme-court>

‘Ella Adoo-Kissi-Debrah: Air pollution a factor in girl's death, inquest finds’ – 16/12/2020

<https://www.bbc.co.uk/news/uk-england-london-55330945>

'Air pollution death settlement is not a win – mum' – 31/10/2024

<https://www.bbc.co.uk/news/articles/c5yx6leg4nqo>

Some local roads and junctions are projected to operate in excess of capacity in future, even without the additional traffic from this development and local residents will likely have to deal with the results of this – increased traffic, pollution, delays, loss of amenity. Mitigation might not always be possible or affordable.

Planning approval should not be granted for development which would make traffic congestion significantly worse, without suitable mitigation which is planned and approved ahead of any approval given for this development.

If a similar methodology to traffic modelling was applied to Ipswich's Ravenswood development, then the resulting traffic issues there strongly indicate that this methodology is unsound:

Ipswich: Calls for solution to prevent Ravenswood traffic chaos

<https://www.ipswichstar.co.uk/news/23209032.ipswich-calls-solution-prevent-ravenswood-traffic-chaos/Inconsistencies in the Transport Assessment>

In the 'Transport Assessment Part 1', section **7.6.2.1 Junction 1 – Tuddneham [sic] Road/ Humber Doucy Lane – Priority Junction** on page 55 states that *"The summary results from all future year scenarios indicate that the junction will perform within the limits of practical capacity and as such no mitigation measures are required to be considered at this location"*.

This does not match the observed traffic conditions by local residents at this location, where traffic can already sometimes back up to the Inverness Road estate – approximately 400 metres from this junction.

There seems to be an error in section 7.6.2.6 for Junction 11 – Rushmere Road / A1214 – Roundabout on page 68, which states that *"Under 2032 Baseline + Development traffic flow conditions, the junction is predicted to operate **within the limits of practical capacity** for a roundabout junction, with a maximum RFC of **0.90** being experienced during the PM peak hour"*.

But as a comparison, towards the end of 7.6.2.7 for Junction 12 – Tuddenham Road / A1214 Colchester Road / Valley Road – Roundabout on page 72, a lower RFC number of **0.89** is given – but the report says that this will be *"in excess of its practical capacity"*.

So the definition of "practical capacity" seems to be inconsistent. Both J11/J12 roundabout junctions are priority (not signalised), so the RFC of 0.85 should be the threshold used – as stated in section 7.5 on page 50. Also the future traffic projections have been modelled with the 'Junctions 9' software – which is for priority junctions, rather than 'LinSig V3', for signalised junctions.

An RFC of 0.85 for priority junctions is *"where congestion is likely to begin to occur."* – section 7.5, page 50.

Also of concern, in **7.6.2.7 Junction 12 – Tuddenham Road / A1214 Colchester Road / Valley Road – Roundabout** on page 70, the junction is already operating at practical capacity limits *"with a maximum RFC of 0.85 being reported during both the AM peak hours"*. But also *"the outcome of future year scenarios indicates that the performance of the junction continues to exceed the limits of capacity, with the highest RFC of 1.07 being experienced during the PM peak hour, with an associated maximum queue of 117.6 vehicles in 2032 Baseline + Development Scenario."*

The conclusion for 7.6.2.7 says *"It is anticipated that further improvements will be required to the junction in future even without the Proposed Development."*

In Section 8, Summary and Conclusions, on page 75, *"These assessments demonstrate that in the assessment scenario year of 2032 with predicted background traffic growth, committed development generated traffic and predicted traffic generated by the completed Proposed Development Junctions 1, 3, 5, 6 and **11** will continue to operate within capacity."*

But the report has already indicated that RFC numbers of 0.85 and above for priority roundabouts are in excess of the "practical capacity" and where "congestion is likely to begin to occur". As Junction 11 at the Rushmere Road / A1214 Roundabout has a predicted RFC of 0.90, why is it included in the list of junctions that are said to be operating within capacity in future?

Junction 2 – Humber Doucy Lane / Inverness road

Junction 2 is both an existing junction from Inverness road and will also form part of the access junction for this development. J2 is listed within the 'detailed capacity assessment' in section **7.4 Sifting criteria on**

page 49, but doesn't appear to have 2023 or 2026 Baseline data later on. Inverness road is already used as a shortcut between Sidegate Lane and Humber Doucy Ln, so this data is important.

Pedestrian access, footpaths and safety

A significant section of the northern end of Humber Doucy Ln and Tuddenham Road are routes in the 'Pedestrian accessibility audit study area' in figure 4.1 (page 18) but these areas are without pavements or footways, for approximately 1.1km of road – approximately; 330 metres of the northern end of Humber Doucy, from there 680 metres south on Tuddenham Road, also 100 metres north on Tuddenham Road (to a secondary proposed road/footway access to the development).

Because of the close proximity of existing properties and private land to the road, it is unlikely that pavements could be consistently accommodated to any degree. This 1.1km stretch is also without street lighting. The Travel Plan Part 7 shows a pedestrian route (also designated as a green trail) which exits the north-west of site and connects to Tuddenham Road, just north of the Humber Doucy Lane junction (J1). But there is no existing pavement or pedestrian connectivity beyond this point to anything, so this route abruptly ends. This is indicative of the issues with transport for this development.

This northern end of Humber Doucy Ln and Tuddenham Road is a rural/agricultural setting. Due to obstructions, properties and private land abutting the road edge, there isn't space to create consistent pavements and similar safe routes for pedestrians. IBC would therefore likely be in breach of the 15% modal shift for sustainable travel within their Local Plan.

Developers do not have compulsory purchase powers, so any necessary road features like pavements, roundabouts or improvements to junctions or road widening here is unlikely to be possible. So the current proposal is unacceptable.

Vehicle Access from Development onto Tuddenham Road

Tuddenham Parish Council objected on a number of points (see below) including that Policy SCLP12.24 (Suffolk Coastal Local Plan) made clear that the development should be accessed from Humber Doucy Lane, not Tuddenham Road:

Tuddenham St Martin Parish Council object to this application.

The objection is based on the grounds of:

- the inevitable impact of additional traffic on the village of Tuddenham St Martin
- the vehicular access proposed to be taken from Tuddenham Road
- the lack of proposals for safe use of footways and cycleways to access key social and economic destinations, including neighbouring villages, local services and facilities, including Westerfield train station
- the inevitable impact of additional pupil numbers for the catchment high school

There appears to be no proposals to mitigate the inevitable impact of increased traffic on the village of Tuddenham St Martin.

Policy SCLP12.24 (Suffolk Coastal Local Plan) is clear that the development should be accessed from Humber Doucy Lane. Highway access should comply with the Local Plan Policy and this states that 'The site is expected to be accessed via Humber Doucy Lane, as part of the masterplanned approach with the adjoining land in Ipswich Borough'. Vehicular access on the Tuddenham Road would be contrary to the Local Plan and significantly impact the rural highways in Tuddenham which already suffer from the daily volume of non-village related traffic.

The application fails to specify the proposed improvements to allow safe travel by pedestrians and cyclists to and from the development.

The proposed secondary exit is too dangerous onto Tuddenham Road (with unrestricted speed). Tuddenham Road and Church Lane (unrestricted speeds) are known accident black spots, as is the Tuddenham Road and Humber Doucy Lane junction, although this is a 30 mph limit. (Photos and records available).



- No account taken of the access and egress to large Veterinary Practice, also adjacent to Humber Doucy Lane and Tuddenham Road junction.
- Recent accident, Sunday September 1st 2024, just beyond Humber Doucy Lane Tuddenham Road Junction heading south in a 30 mph zone.
- Insufficient account of road conditions and future pressures from both consented and unconsented access/egress points near Cemetery/Hump Back Bridge on Tuddenham Road to Colchester Road.



2. Environmental Impact Assessment (EIA) should be conducted due to pressures on Fynn Valley Country Wildlife site, PROW and protected species, flora and fauna.

3. Health Impact Assessment

					Patients per GP			HIA Kevin Coleman
	Practice (data as at 31 Dec 2021)	Practice list size	Patients per GP - FTE This includes trainee GPs and Locums	Patients per GP - FTE	FTE	Patients per GP - FTE	GP FTE	Patient numbers
				Includes trainee GPs and Locums	excluding Trainee & Locum	excluding Trainee & Locum		
	BARRACK LANE MEDICAL CENTRE	19890	1437.14	13	2673.39	7.45	7	19435
	BURLINGTON ROAD SURGERY	17453	2164.81	8	3438.7	5.07	5	16733
	IVRY STREET MEDICAL PRACTICE	12426	1505.09	8.25	1728.39	7.21	9	12209
	ORCHARD MEDICAL PRACTICE	14217	1563.51	9.09 (12)	2042.77	6.9	9	14460
	TWO RIVERS MEDICAL CENTRE	28074	1831.36	15.32	2639.46	10.63	15	26378
	Totals	92060	8501.91	44.57	12522.71	37.26	45	89215
				2065.5 pts each		2470 pts each	1982 pt each	

* FOI request to Suffolk & N E Essex Alliance regarding more accurate data on GP Availability and current patient load show that the situation is far worse than indicated within the Mersey Health Impact Assessment, where it is conceded that local GPs are beyond recommended patient load and the problem is escalating.

SOCS HIA Analysis

SOCS have looked at the figures and have assessed the data.

There are further pressures evident on Experienced GPs.

Surgeries can only cope with trainees and Locums.

Mersey's report acknowledged the pressure with GPs, assuming 'full time GPs' (FTE) having too big a case load (1982 patients averaged when recommended figure is 1800)

However, the current figure is 2065.5, is way over! And includes trainees and locums.

If they are excluded, (i.e. inexperienced and part time) the figure for experienced FTE GPs is 2470 patients per GP. That is 30% more than recommendations!!!!

This leaves too much capacity for things to go wrong in our view!

New MP for Central Suffolk and North Ipswich Patrick Spencer said: "For too long residents in North Ipswich and surrounding areas including Claydon, Barham and Henley have been struggling to access the good quality patient care and health services they deserve. <https://www.eadt.co.uk/news/24516361.plans-new-ipswich-surgery-still-awaiting-nhs-approval/> <https://www.eadt.co.uk/news/24516361.plans-new-ipswich-surgery-still-awaiting-nhs-approval/> <https://www.ipswichstar.co.uk/news/24640463.ipswich-super-surgery-plan-scrapped-cost-over-run/>

4. Arrangements such as Section 106 agreements for this may need to be recalculated for HIA purposes.

Appendix A

Northern Fringe Protection Group submission included with permission

We concur with our neighbouring Group's comments, Northern Fringe Protection Group, (which echo what both Save Our Country Spaces and Northern Fringe Protection Group, stated at the 2020 Local Plan Inquiry in Public.) If possible, we would appreciate the opportunity to present our views at the Appeal hearings.

'Planning Inspectorate Appeal for IP/24/00172/OUTFL, Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane, Ipswich, Suffolk, IBC Appeal reference: APP/R3515/W/24/3350674

On behalf of the Northern Fringe Protection Group, we would like to make the following additional comments in relation to the appeal for the above planning application.

We support the multiple objections raised by both Ipswich (IBC) and East Suffolk (ES) local authorities against this application and believe these to be valid concerns that would need to be addressed for the application to be approved.

IBC is clearly a pro-growth Council with an evidence-based Local plan that is regularly reviewed and updated. It has invested in a detailed Masterplan for the Ipswich Garden Suburb that will aid the delivery of new homes whilst ensuring this will be delivered sustainably. IBC has invested in a small team of dedicated Planning Officers to facilitate the delivery of the IGS, which is working well. IBC is clearly not opposed to building new homes on greenfield land whilst taking account of the impacts on the environment and existing infrastructure so that these can be mitigated where necessary.

IBC is only too aware of the major travel and capacity issues that the town faces due to physical constraints impacting the road network and rightly seeks mitigation measures from developers to deliver the required levels of modal shift to allow developments to proceed. There is no alternative to this approach, which was agreed by Planning Inspectors at the recent Local Plan hearings (consistent with previous Local Plans decisions). IBC successfully secured substantial funding from the Housing Infrastructure Fund for new infrastructure required to unlock the IGS for developers to build new homes. This included funding for a new pedestrian/cycle bridge and a road bridge without which much of the IGS would not have been approved. Major junction improvements for the A1214 are also required to unlock the IGS and have been scoped out with developers. It is worth noting that outline planning consents for most of the IGS had already been granted and detail applications approved for several phases that have not yet been started or completed by developers. A revised application for Red House Farm has also been submitted following detailed discussion with SCC and IBC to address outstanding issues. IBC, along with Suffolk County Council (SCC) have worked hard with developers to agree the major infrastructure improvements required for Westerfield Road. This may have slightly delayed the commencement of building on these sites but obviously it is important to get the new junction and the cycling/pedestrian infrastructure designs right to enable access to and from the IGS sites in a safe and efficient manner for all users. It is reasonable and proper for IBC to do the same for Humber Doucy Lane, indeed it would be a dereliction of duty if IBC did not do this. Furthermore it would completely undermine the hard work on transport infrastructure and sustainable travel obligations that IBC has undertaken to ensure the successful delivery of the IGS. IBC is also working hard to deliver new housing developments on brownfield land in and around the town centre. IBC has set up its own house building company, [Handford Homes](#), that has quickly established a successful track record in developing brownfield sites in Ipswich, some of which would not have been developed otherwise and/or brought forward as quickly.

It is also worth noting that IBC has been successfully re-developing both the old Sproughton Sugar Beet site and the Cranes industrial site for employment purposes. IBC is clearly pro-actively encouraging new developments across Ipswich for both new businesses and homes. IBC's decisions on Humber Doucy Lane should be respected accordingly.

We support the objection raised by SCC in relation to the drainage and flood risk assessment. The applicant has clearly not provided sufficient detail for this application to be approved and there is no Masterplan or Framework to address this issue.

We note the contributions required by SCC for primary and high school places for the new schools to be built on the IGS. Without these schools in place, there will be no places available in the surrounding area hence the need for a later delivery of this site in accordance with the approved Local Plan, where Planning Inspectors specifically addressed this concern. The only option for parents will be to drive their children to school, which will fail to deliver the modal shift requirements embed in IBC's Local Plan and is in breach of national planning sustainability requirements.

We support the multiple objections raised by SCC in its capacity as the Local Highway Authority. The non-provision of integrated cycling and pedestrian routes will fail to achieve the 15% modal shift requirement on the development in IBC's Local Plan in breach of its sustainable travel requirements. The proposed junction design is clearly not acceptable and far greater improvements to road, pedestrian, cycling and bus infrastructure are required before this application could be considered compliant with Local Plan and national planning sustainable access and travel requirements.

The implications of this development coming forward before the junction improvements required under the IGS Masterplan have been made and the new schools in the IGS have been delivered would also need to be assessed. Ipswich suffers from major traffic issues, especially when the Orwell bridge, Copdock junction and surrounding A14 have any form of incident. The A1214 bears the brunt of this as is the only alternative route for road users and the large amount of road freight traffic in relation to Felixstowe docks, which will further increase with Sizewell C. The IGS Masterplan and Local Plan have an agreed timescale for A1214 junctions improvements, without which the A1214 will not be able to handle traffic from the Humber Doucy Lane development and it will be unsustainable.

We agree with the objection raised by National Highways. As we previously mention, traffic is a major issue in and around Ipswich and clearly the application fails to provide sufficient information for the application to be properly assessed.

We share the concerns of Network Rail on the potential impact of traffic on Westerfield railway crossing. We have raised concerns on the safety of pedestrian and cycling infrastructure around this crossing in our response to the recent consultation for Red House Farm.

With respect to the comments in relation to the build out rate of the Ipswich Garden Suburb, it is worth noting that the appellant Barrett David Wilson Homes is the Phase 2 builder and is in control of some of the slight shortfall. We also note that Barrett David Wilson has recently submitted a Variation application for Phase2, which will not help their build rates. We are aware that Crest Nicholson, the Phase1 developer, has had difficulties in selling completed homes at the prices they would be prepared to sell at despite offering discounts, funding arrangements and property enhancements. Clearly these are beyond the influence of IBC as is the cost of living crisis which impacts on the purchasing power of most prospective new home owners. Obviously IBC has no way of forcing developers to build the homes they have planning consent for.

We note the appellants spurious argument around the difference between a Framework and a Masterplan. Of course, what matters is whether the appellant has provided sufficient detail for the application to be assessed and that the proposals provided meet Local Plan and national planning requirements. As the multiple objections by multiple organisations demonstrates, there is clearly insufficient detail in the application and the information provided fails to meet Local Plan (and hence national planning) requirements. This appeal should be rejected accordingly.

If possible, we would appreciate the opportunity to present our views at the Appeal hearings.'