



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Statement to the Planning Inspectorate Inquiry 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

Thank you for giving me the opportunity to make this Statement on behalf of the Northern Fringe Protection Group. I apologise for my limited availability due to previous commitments. Our Group is not opposed to the provision of new homes for Ipswich but wishes to ensure the delivery of the required infrastructure in a timely manner to mitigate unacceptable impacts of new developments, in accordance with the Ipswich Local Plan. We have actively engaged with Ipswich Borough Council (IBC) officers, who have always been willing to listen to and discuss our concerns in relation to planning issues.

We supported the multiple objections raised by IBC, East Suffolk (ES), Suffolk County Council (SCC) and other agencies, such as Sport England, against the original application and through our extensive local knowledge believed these to be valid. I am aware that several issues may have been resolved but would still like to outline our concerns.

We have previously responded in detail to similar major planning applications, but with Humber Doucy Lane we felt it was so obvious that the application failed to comply with so many aspects of the National Planning Policy Framework, Local Plan and other IBC planning policies that it was not worth our time to do so, as it was a foregone conclusion that it would be quickly rejected. The large volume of additional documents submitted by the Appellant, as part of this Inquiry, clearly illustrates that insufficient detail was provided with the initial application and that it was right for it to be rejected.

IBC has a Strong Delivery History

IBC is a pro-growth Council with an evidence-based Local Plan that is regularly reviewed and updated. The Council invested heavily in a detailed Masterplan for the Ipswich Garden Suburb to facilitate the delivery of new homes. In accordance with Policy ISPA4, we were

also expecting a Masterplan for ¹the Humber Doucy Lane sites but no detailed Masterplan was provided with this planning application. The application is non-compliant with Policy ISPA4.1, which was approved by Planning Inspectors and adopted by IBC in March 2022.

IBC has demonstrated it proactively supports 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 also working hard to deliver new housing developments on brownfield land in and around the town centre through its own house building company, [Handford Homes](#). It has quickly established a successful record in developing brownfield sites, some of which would not have been developed otherwise 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. We believe IBC's rejection of this application, which is non-compliant with the recently examined Local Plan, should be respected accordingly.

Ipswich Borough Council Local Plan Review 2018-2036

The Planning Inspectors' Report² on the Examination of IBC's Local Plan specifically addresses Humber Doucy Lane in Policy ISPA 4 and stipulated specific main modifications to make the Plan sound. These are detailed in paragraphs 162 to 181 of the Report and as such must be adhered to by Developers and cannot be relaxed by IBC as this would render the recently examined Plan, unsound. This planning appeal raises the risk of challenging previous Planning Inspectorate decisions and the Local Plan itself.

¹ : Cross Boundary Working to Deliver Site paragraph 4.1.

² Dated 17 February 2022 to Ipswich Borough Council by Karen L Baker DipTP MA DipMP MRTPI & Mike Hayden BSc DipTP MRTPI Inspectors appointed by the Secretary of State Planning and Compulsory Purchase Act 2004 (as amended) Section 20.

Paragraphs 166-168³ relate to off-site highway infrastructure and sustainable travel with substantial contributions from the developers required to deliver junction and accessibility improvements. These have not been fully addressed by the Appellant who has failed to demonstrate the delivery of at least 15% modal shift required to comply with the Local Plan. As well as junction improvements at both ends of Humber Doucy Lane, the two road bridges on Tuddenham Road, will also require major improvements to allow pedestrians and cyclists to travel safely from the proposed new homes. Tuddenham Road is an unclassified road without pavements along much of the route. The bridge nearest Church Lane is especially narrow with only 4.5m road space at one point. Neither bridge has sufficient road space to fit safe pedestrian and cycle infrastructure compliant with DFT Cycle Infrastructure Design Local Transport Note 1/20. Given the existing road space constraints, it is unclear how such infrastructure will be provided from the humpback bridge to Church Lane and beyond, or how much it would actually cost to deliver. We would like to understand how the Section 106 contributions are derived and split out to show the costings for Tuddenham Road improvements.

Ipswich Urban Characterisation Study for the North East Character Area

We would like to draw attention to the Ipswich Urban Characterisation Study for the North East Character Area. This includes the Character Sub Area known as the Rural Edge which forms the borough boundary to the north and east, including along Humber Doucy Lane. The Summary on page 15 states;

³ 166. Access to the site would be taken from Tuddenham Road and HDL [Humber Doucy Lane], both of which currently operate with two-way traffic. But given the location of the site on the edge of Ipswich, around 3.5 km from the town centre, accessibility improvements will be required. Whilst there are opportunities to improve the junction of HDL and Tuddenham Road and the width of HDL on land within the site, the Highway Authority acknowledges that the options to significantly increase traffic capacity are limited by space constraints. 167. Therefore, the transport and access strategy for the site, relies on good quality walking, cycling and bus routes to the town centre and local services and facilities, plus other sustainable transport measures to manage travel demand, encourage modal shift and contain road traffic growth. 168. Currently, Policy ISPA4 identifies the need for transport network improvements, but not demand management measures to mitigate impacts. Accordingly, MM17 includes wording to this effect in the policy, with reference to the ISPA Transport Mitigation Strategy. MM18 and MM22 make consequential amendments to the supporting text, including the need for financial contributions towards sustainable transport measures.

“Any new development along the rural edge requires very careful and sensitive consideration, should be master-planned, and have regard to contributing to the green rim and other strategic walking and cycling routes where appropriate.”

The Appellant has failed to comply with these requirements, which are reinforced in Local Plan Policy ISPA4.

Framework or a Masterplan? – poor Landscape design

We note the Appellant’s 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 demonstrated, there was clearly insufficient detail in the application and the information provided failed to meet Local Plan and national planning requirements. A Masterplan for Humber Doucy Lane that links in with the Masterplan for the IGS is required.

We would have expected the Masterplan design to be led by the landscape and infrastructure, rather than by maximising the number of homes that can be squeezed onto the site and then trying to work around that. The lack of a Masterplan has resulted in a poorly designed landscape buffer zone, with insufficient areas of appropriate green/open space typologies. We do not believe that the disparate nature of the resulting open space, with large drainage basins, delivers the effective “Suitable Alternative Natural Green Space (SANGS)” required for Habitat Regulations Assessment (HRA) mitigation purposes⁴. It appears that much of the Appellant’s drainage, transport and landscape experts work was undertaken after the application had been submitted and was not made available for public consultation.

The current design decision-making process, as part of this Inquiry and under tight timescales, is not “Master planning”. We are concerned that this process will result in an excessive number of Conditions with details still to be agreed. These will then need to be

⁴ For RAMSAR wetland sites and Special Protection Areas.

monitored and enforced with limited resources to do so. Such Conditions will then also avoid public consultation, which brings me onto Community Engagement.

Community Engagement

Community engagement by the Appellant between the end October 2023 and Mid-February 2024⁵ has been rushed, sub-standard with insufficient detail and lacking material updates. The two separate community engagement sessions were each only held between 3-7pm on one day. Many people, including myself, would have been unable to attend this restricted period. As a minimum they should also have taken place in the mornings as well and at least to 8.00pm in the evening.

The drip feeding of multiple additional reports/documents arising from this Inquiry is substantial, making it impossible even for a reasonably informed person like me to keep up with. Local residents, without such knowledge, have no chance and those without internet access and IT skills are completely excluded. I personally feel completely disenfranchised by the entire process, even though the NFPG was identified as one of four community stakeholders⁶ in the Appellant's Statement of Community Involvement.

The NFPG responded to the Appellant's community consultation on 13 March 2023⁷. In IBC's formal consultation, we objected to the Appellant's Statement of Community Involvement and how our submitted response was glossed over by the Appellant summarising our position as *"The group highlighted the necessity of early engagement with local community groups to ensure transparency and collaboration. It also discussed adherence to local plan requirements, ensuring that upcoming projects align with established guidelines and policies"*.

In particular, the application has not addressed our key concerns in relation to the delivery of off-site transport infrastructure improvements to Humber Doucy Lane and surrounding

⁵ Community consultation 3-7pm on 30 October 2023, Update December 2023, Further community engagement 3-7pm 15th February 2024.

⁶ Along with Councillor Sandy Martin, the then incumbent MP, and Rushmere Parish Council.

⁷ Receipt of our response confirmed by Daniel Rowson, Account Executive on 15 March 2023.

roads to make them safe for walking and cycling routes as required to deliver the 15% modal shift requirement of the Local Plan. These issues were raised by many local residents as their main concerns, yet the Exhibition Boards at the final Community event in February 2024 failed to consider these two fundamental issues at all. The proposals were described as “Concept Plans” or “Development Concepts” so we were expecting a further round of community engagement on a Detailed Masterplan that addressed these fundamental issues repeatedly raised by the Community.

We do not feel our concerns have been listened to by the Appellant and certainly there has been no response to them, even though we were identified as a major stakeholder. There has not been proper consultation with the public on what the application is now proposing, as much of the detail of the application has only been submitted as part of this Inquiry. This demonstrates that the initial application was premature, without sufficient detail, lacking community engagement or proper consultation and it was correct for it to be rejected by Ipswich and East Suffolk councils. The public has a right to be properly consulted on fully detailed proposals and local councils are required to ensure that this takes place. This has not happened with this application.

Currently key infrastructure and design decisions are being made behind the scenes as part of this Inquiry, which are outside the usual planning application process thereby bypassing public consultation. When will the public be formally consulted on these material changes to the original planning application?

Transport Issues

Ipswich suffers from major traffic issues, especially when the Orwell bridge, Copdock junction and the surrounding A14 have any form of incident. The A1214 endures the worst of this as it is the main alternative route for road users specifically the large amount of road freight traffic in relation to Felixstowe docks, which will also increase with Sizewell C. Ipswich traffic issues are well known and frequently reported on by the local paper as regular and heavy congestion is a major issue for Ipswich residents, with repeated calls for a Northern Bypass by Ipswich politicians.

It is right to seek 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 Local Plan examination. As mentioned earlier, the Inspectors demanded specific changes to the draft Local Plan to ensure the timely delivery of *“The A1214 junction mitigation”* to make the Plan sound. Until such improvements are in place, bringing forward the Humber Doucy Lane site is premature and unsound.

IBC successfully secured substantial funding from the Housing Infrastructure Fund for a new pedestrian/cycle bridge and a road bridge to help unlock the IGS, without which much of the IGS could not have been approved. Major junction improvements for the A1214 are also required to unlock the IGS and have been agreed with developers as part of the IGS Masterplan. The delivery deadline for the Tuddenham Road roundabout is based upon Humber Doucy Lane being delivered in accordance with the Local Plan. If Humber Doucy Lane is delivered earlier then there will be insufficient capacity at Tuddenham Road roundabout and no pedestrian and cycling infrastructure improvements. This would make it far more dangerous for schoolchildren from the IGS to access Northgate High School. Humber Doucy Lane should not be commenced until the required improvements to Tuddenham Road roundabout have been delivered as planned. Cycling and pedestrian infrastructure improvements from Tuddenham Road to Northgate High school have not yet even been designed by SCC.

The implications of Humber Doucy Lane coming forward before the junction improvements required under the IGS Masterplan and before the new school places for the IGS at Northgate have been delivered, need to be fully assessed. The IGS Masterplan and Local Plan have an agreed timescale for A1214 junctions improvements, without which the A1214 will not be able to cope with additional traffic from the Humber Doucy Lane development.

We supported the multiple objections initially raised by SCC in its capacity as the Local Highway Authority, which were consistent with the Local Plan. We note that all three Parish

Councils around the development raised similar concerns on the impacts on local roads, access to/from the development and lack of safe pedestrian and cycling infrastructure. The strong consensus on these issues demonstrate that rejecting the application was the correct decision.

We agreed with SCC that the proposed junction design was not acceptable and greater improvements to road, pedestrian, cycling and bus infrastructure were required before this application could be considered compliant with Local Plan and national planning sustainable access and travel requirements. There is considerable risk of rat-running through the Selkirk estate especially Inverness, Renfrew and Dumbarton Roads that will need to be mitigated. The current proposals have not demonstrated compliance with DFT Cycle Infrastructure Design Local Transport Note 1/20 and need to be revised to ensure compliance. In particular, a 3m pedestrian/cycleway along the entire length of Humber Doucy Lane is required to be delivered before first occupation.

The Appellant has failed to demonstrate how it will achieve the 15% modal shift requirement in the Local Plan but more importantly the non-provision of integrated cycling and pedestrian routes will fail to allow safe travel from the development especially for schoolchildren and their family members when cycling and walking to and from school. The proposals do not provide safe access for residents to the Selkirk local centre. Further improvements to the existing Public Rights of Way are also required to make them safe and more accessible. We expected to see the proposed pedestrian/cycling routes and infrastructure design included in the Masterplan. But there is no Masterplan.

Cycling has been my main mode of travel in Ipswich and surrounding villages for almost 40 years. Humber Doucy Lane is one of only two roads in Ipswich that I will not cycle on, due to major safety concerns and unacceptable risk of accident⁸. The other being the bottom of Norwich Road between Bramford Road junction and St Matthews roundabout.

⁸ This is due to rat/running, speeding vehicles, inappropriate overtaking and not being giving sufficient/safe road space.

Transport Assessment (TA)

We shared SCC's initial concerns with the Transport Assessment but do not understand why these have been withdrawn.

- The TA still fails to demonstrate that it will support the achievement of at least a 15% modal shift, in accordance with the ISPA Transport Mitigation Strategy. It is non-compliant with POLICY CS5: IMPROVING ACCESSIBILITY of the Local Plan.
- The Sustainable travel assumptions are incorrect as insufficient offsite pedestrian and cycling infrastructure is provided and improvements to public rights of way are lacking so people will not be able to travel sustainably. There is no safe route to the nearby Country Park and Fynn Valley so people will drive there.
- We disagree with 2026 being taken as the first year of occupation as the Appellant has failed to demonstrate that it will comply with the Local Plan so first occupation is likely to be later when more traffic from the IGS will be on the roads.
- We object that the Appellant's Transport Assessment is based on a single-day traffic study⁹, which risks not being representative, and that it uses the Red House Farm Transport Assessment as the baseline, when the Red House application has not been approved. We have raised a number of concerns with the Red House Farm Transport Assessment that has recently been consulted on.
- Most concerning is that the TA does not include the impact of the LEA 's change in education strategy for the IGS, which will result in school children travelling off the IGS to Northgate and Suffolk One. As well as additional traffic movements off the IGS site, there will also be increased use of road crossings along Valley/Colchester Roads affecting traffic flows. It is incomprehensible that SCC has accepted a Transport Assessment based on a high school located on the IGS when SCC has no intentions of providing one. How can this be acceptable?
- The TA also excludes SCC's proposal to make the Tuddenham Road humpback bridge by the Hockey Club, single direction with a pedestrian/cycling lane and crossing. This is intended to allow safe access to Northgate High School from Red House Farm, via the proposed combined cycle/pedestrian pathway to Tuddenham Road at the foot of the

⁹ Conducted on the 12th October 2023.

humpback bridge. This will obviously have an impact on traffic flows along Tuddenham Road and must be modelled accordingly.

- Several additional local junctions, which will be affected by traffic from this development are not accurately assessed; such as Tuddenham Road/Church Lane, Colchester Road/Heath Road/Woodbridge Road, Humber Doucy Lane/Playford Road, Playford Road/The Street Rushmere roundabout and Westerfield Road/Valley Road.
- It appears that increased traffic from the full expansion of Westerfield House Care Home, the ongoing expansion of Ipswich Hospital and for Sizewell C has not been included in the TA. Nor has the additional traffic flows on Tuddenham Road and Church Lane etc arising from the increased closure times of Westerfield Road railway crossing due to new Sizewell C trains and increased Felixstowe Docks freight¹⁰. Scenario analysis of the impacts of the potential Westerfield quarry also need to be examined.

Consequently the Appellant has not properly identified or assessed the potential adverse impacts of the development proposals on the transport network nor has the Appellant determined the appropriate mitigation packages that would need to be deployed to address those impacts.

Construction Traffic Management Plan and Air Quality

We object that there is no Construction Traffic Management Plan submitted with this application. There is currently no safe route to the site for Construction Traffic accessing Humber Doucy Lane and travelling along it. It is not safe for such traffic volumes to use Sidegate Lane due to the two schools and the junctions at either end of Humber Doucy Lane are not suitable for the site's construction traffic. A Condition would be required for a safe Construction route to be agreed and implemented prior to on-site construction commencing, which would entail improvements to Humber Doucy Lane. This Condition should also require improvements to the Tuddenham Road roundabout and around the Tuddenham Road rail bridge as required under the IGS Masterplan. This is a key reason Humber Doucy Lane should be delivered in accordance with the Local Plan timescales.

¹⁰ Through the Ely crossing upgrade as confirmed by Network Rail in FoI requests.

We are also concerned that the volume of construction traffic for simultaneous build out of the three IGS sites plus Humber Doucy Lane will overwhelm local roads. It is worth noting that such construction traffic is excluded from the TA.

A Condition would also be required for the impacts of air pollution from construction traffic and particulates from the site on local residents to be assessed and mitigated against before construction can proceed.

Site visit

For the reasons we have detailed, we believe that it is important for the Planning Inspector's site visit to include traffic routes through the Selkirk estate, the entire length of Humber Doucy Lane and along Tuddenham Road from the humpback bridge to Church Lane, with particular regard to the two bridges.

Drainage and Flood Risk Assessment

We supported the objection raised by SCC in relation to the drainage and flood risk assessment especially as the area is known to flood and existing drainage ditches appear to have been omitted. Obviously, SCC is better placed to provide a technical assessment than we are so we accept its' opinion. We know that both IBC and SCC have worked hard to ensure the IGS has an acceptable SUDs system to prevent flooding and we respect their judgement.

Loss of Playing Fields

We agree with Sport England's objection to the loss of the rugby playing field, without any replacement being proposed. The proposed MUGA is not a suitable alternative and lacks detail. Following the change in strategy by the LEA for this part of Ipswich and the removal of the IGS high school, this is now a far greater issue as the school playing fields and indoor facilities, were to be shared with IGS residents and the wider community. The loss of the existing well-used rugby facilities would be far greater than when Sports England objected to this application. Over the years, public access to sports facilities in this area has been reduced with Ipswich Football Club taking over the Crane's site and Ipswich School taking

over the large Willis Faber site, resulting in the withdrawal of access for such clubs as YM Tennis. IBC reports confirm that there is already a major deficit of sports facilities in neighbouring Castle Hill and St Margarets wards, which has been ignored by the Appellant. Replacement playing fields must be provided before this application can be approved. Overall the development is lacking sufficient usable open space.

Ipswich Shortfall in New homes

With regard to the shortfall in new homes, it is worth noting that outline planning consents for most of the IGS has 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 and SCC have worked hard with developers to agree the major infrastructure improvements required for Westerfield Road. Unfortunately, this may have 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 necessary work on transport infrastructure and sustainable travel obligations that IBC has undertaken to ensure the successful delivery of the IGS.

It is also worth noting that IBC is successfully delivering new homes on more difficult brownfield sites, unlike the slowed build rate on the IGS by the larger house builders. The Council is also building a considerable number of affordable homes unlike many local large developments, which tend to result in the delivery of affordable homes in later phases at lower levels than required under the Local Plan. With respect to the Appellant's comments in relation to the build out rate of the Ipswich Garden Suburb, it is worth noting that 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 Phase 2. We believe that Crest Nicholson, the Phase 1 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 issues 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 already have planning consent for.

Thank you for providing the opportunity to present our views at this Inquiry. For the reasons we have outlined , we believe this Appeal should be rejected.