

Transport Mitigation Strategy for the Ipswich Strategic Planning Area (“IPSA”)

NOTE

1. This Note has been prepared to provide some context to the “Ipswich Strategic Planning Area Contribution” referred to in the (draft) s.106 agreement and as more particularly discussed in the evidence of Mr Cantwell-Forbes and at the RTS on Day 2 of the Inquiry.

The ISPA Transport Mitigation Strategy

2. The Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (“the TMS”) is a document produced in August 2019 which details the work undertaken to provide the strategy to support plan led growth in the Ipswich Strategic Planning Area.¹ That document explains, at para 1.1.9:

“The focus of this strategy is mitigation within Ipswich as it addresses the cumulative impact of the ISPA local plans within the county town, this work will support the Local Transport Plan strategy for Ipswich. Mitigation outside of Ipswich will be addressed within each planning district through the Infrastructure Delivery Framework, recognising that good practices identified within the Ipswich focussed strategy could be effectively applied outside of this area.”

3. The need for a strategic mitigation approach arose during preparation of the development plan processes for the borough/district Councils: see (eg) PP2 (Inspectors’ Report on the Examination of the Ipswich Borough Council Local Plan Review 2018-2036) paras 74-79 (pg 23) and PP15 (ESC Response to Matter 3 Area Specific Strategies – Development Allocations) response to Q3:23 (pg 29).

¹ The Ipswich Strategic Planning Area incorporates Suffolk County Council, Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council and East Suffolk Council (in relation to the area of the former Suffolk Coastal District).

4. It is reflected in the Ipswich Borough Council Local Plan (DP1) policies ISP4A (pg 44)² and CS5 (pg 65) and the ESC development plan (DP2) policies SCLP 2.2 (pg 30),³ SCLP 12.18 (pg 265),⁴ and SCLP 12.24 (pg 282).⁵
5. The TMS sets out the work streams proposed to be taken forward to develop a mitigation strategy to inform a mitigation delivery programme: *“this will include measures with associated indicative costs, delivery mechanism and a consideration of funding alternatives”* (TMS para 1.11). The *“purpose”* of the work *“is to develop a transport mitigation strategy that informs an implementation programme of measures that will support the ISPA local plans by delivering modal shift in Ipswich”* (TMS para 1.12).
6. Chapter 5 of the TMS discusses the *“mitigation approach”*, considering *“key areas that could deliver”* the modal shift changes sought (TMS para 5.1.1). These included walking and cycling, and the improvement of infrastructure for the same (section 5.4).

² See also the Explanatory Text at para 8.25: “Financial contributions will be required towards off-site healthcare facilities and the overall package of sustainable transportation measures to be delivered through the implementation of the ISPA Transport Mitigation Strategy.”

³ See also the Explanatory Text at para 2.15:

“Development in the Ipswich Strategic Planning Area is predicted to collectively add to significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and the ISPA authorities agree that robust steps must be taken to prioritise healthy and sustainable travel. A package of transport mitigation measures has been identified to reduce vehicle movements. Suffolk County Council as the Highway Authority has developed a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network. These include:

- Y Transport infrastructure to encourage and support sustainable modes of transport
- Y A Bus Quality Partnership
- Y A Smarter Choices programme
- Y Review of car parking and pricing strategies
- Y Review of park and ride strategy
- Y Junction improvements”

⁴ See also the Explanatory Text at para 12.178: “Development in the Ipswich Strategic Planning Area is predicted to collectively add to significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and the ISPA authorities agree that robust steps must be taken to prioritise healthy and sustainable travel. A package of transport mitigation measures has been identified to reduce vehicle movements. Suffolk County Council as the Highway Authority has developed a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network. The Council will work with the other authorities across the ISPA to ensure that there is a co-ordinated approach to funding the mitigation through the delivery of the Local Plan.”

⁵ See also the Explanatory Text at para 12.219 “The site is expected to be accessed via Humber Doucy Lane, as part of the masterplanned approach with the adjoining land in Ipswich Borough. Transport modelling indicates that there are capacity issues on the network close to the site. Due to the proximity and connectivity of the site to Ipswich, and to seek to mitigate any impacts on the surrounding road network, it is expected that a robust package of measures to promote sustainable transport would form part of any proposals.”

7. Whilst it was anticipated in the TMS that a package of mitigation measures, with costings and proposed funding arrangements, would be produced thereafter, the ISPA Councils do not currently have a comprehensive package of measures which are to be taken forward or a schedule/calculation of contributions to such measures to be secured through CIL or s.106 obligations for development within the ISPA area.

The Suffolk LCWIP

8. The Suffolk County Council Local Cycling and Walking Infrastructure Plan (“the LCWIP”) was most recently updated in 2021. Whilst the LCWIP is referenced in the TMS, it was produced independently of the TMS. As explained on Suffolk County Council’s website (link below), *“producing an LCWIP is strongly recommended in the government’s Gear Change report as it is a prerequisite to qualify for some government funding, and very advantageous in securing other funding.”*
9. The LCWIP identifies a prioritised list of potential cycling and walking schemes within the County. This is described, on page 11 of the LCWIP as a list which “contains outline proposals for cycling and walking improvement schemes across the County and is used to guide decisions on budget allocation and to help identify potential options when new funding opportunities arise”.
10. The prioritised list of potential cycling and walking schemes is published online at <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/improvements-for-walking-cycling-and-wheeling> with an outline of each scheme and an estimate of the potential costs involved. This is available as an excel document titled ‘List of prioritised schemes’ under the drop-down heading ‘Background information and funding’.
11. The excel document includes, at row 84, the following:

Area	Location	Proposal outline as July 2021	Potential Funding Source (Local Travel Plan, Section 106, Community Infrastructure Levy, Dept. of Transport)	Deliverability (3 = easiest to deliver to 1 = most challenging)	Estimated Cost (calculated by linear metre)	unweighted MCAF total	BCR (ebike) nb 0 = not scored
Ipswich	Tuddenham Rd	Colchester Rd to St Margarets	LTP, S106/CIL, DfT	3	£1736k	5	2.5

12. That is the route from Colchester Road to the Town Centre via *Westerfield Road* discussed during the Highways RTS on Day 2 of the Inquiry.
13. The website also details funding provided by or available to Suffolk CC in respect of the LCWIP proposals. None of that funding is allocated to the route in the table above, or the route in respect of which contributions to secure improvements are sought in the present appeal.