



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Statement in Response to Addendum to Highways Statement of Common Ground [11/02/2025] ID 28 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

Please find the following comments on ID28 Addendum to Highways Statement of Common Ground, which was released on the Inquiry website on 12/02/25. We maintain our objections to the non-provision of sustainable travel infrastructure, also referred to as off-site active travel improvements, for the following reasons.

1. We strongly object to the repeated use of the caveat “where achievable” in the Table in Section 7. It is unclear who determines whether the required improvements are “achievable” or what the process for this is. We are extremely concerned that much of the proposed pedestrian infrastructure will not actually be delivered. There should be a binding requirement to provide these improvements otherwise there is no guarantee that it will be possible to provide the required safe pedestrian routes. If a binding agreement cannot be reached on the provision of active travel infrastructure as part of this Inquiry, then the application must be dismissed and invited to return with a detailed Masterplan that specifies how this infrastructure will be delivered.
2. We object that there are no agreed proposals for new cycling infrastructure anywhere in the Selkirk estate. Without any safe cycling routes the required levels of modal shift will not be achieved. It also means that the Transport Assessment, which assumes elevated levels of active travel, is unsound. We support the provision of on site cycling infrastructure but this is largely worthless if cyclists can't access safe cycling routes outside of the development. As they will choose to drive instead.
3. We object that there is no agreement to improve cycling infrastructure along Sidegate Lane, without which it will not be safe to cycle to Northgate and Rushmere schools.
4. We object to the omission of improved cycle infrastructure along Sidegate Lane, which will also prevent the provision of an integrated safe cycling route into the town centre.
5. We object that the existing public footpath between Sidegate Lane and Angus Close has been omitted from the agreed off-site active travel routes as this is an obvious route to Rushmere school from the development. This footpath should be included in the agreed routes but needs to be up graded to meet current standards. It also needs to be better maintained.
6. We object that there are no planned improvements to the Sidegate Lane West T junction, just before the row of shops. This is dangerous for cyclists to access the Colchester Road crossing, particularly due to vehicles trying to park when visiting the shops, notably the electrical wholesalers, which attracts a large number of tradespeople in vans, and the Coop.
7. We note that the Concept Plan shows 8 pedestrian and cycle links. We object that:
 - a. There is no offsite pedestrian and cycle route to the link on Tuddenham Road. This is therefore not a pedestrian and cycle link and requires active travel infrastructure to be provided along Tuddenham Road and beyond. The dead end of this route at

Tuddenham Road is dangerous as there is no onwards safe cycling route or pavement for pedestrians.

- b. There is no offsite cycle route from the rail bridge at the top of the development (which is not permissible to cyclists) and no plans to improve the pedestrian route. This is therefore not a pedestrian and cycle link and requires active travel infrastructure to be provided beyond this point.
 - c. There is no offsite cycle route from the corner of E2 near Rushmere Road. Therefore this is not a pedestrian and cycle link and requires safe transport infrastructure to be provided beyond this point.
 - d. There is no offsite pedestrian and cycle route from the corner of A1 on Humber Doucy Lane towards Tuddenham Road and no connection between Parcels A and B with no connection between Parcel A and Sites C & D (of Parcel B). Therefore this is not a pedestrian and cycle link and requires active travel infrastructure to be provided beyond this point that connects with existing cycling infrastructure routes to the hospital and Nacton Industrial Area in one direction and to Kesgrave and Martlesham.
 - e. There are no safe pedestrian and cycling routes along Tuddenham Road and beyond in either direction from the Humber Doucy Lane junction.
 - f. We object the only proposed offsite cycle route is a partial stretch along Humber Doucy Lane between the main access to Site C and Sidegate Lane, which is on the opposite side of the road to Sites B and C. This would require users to dismount and cross Humber Doucy Lane twice in a short distance to access between these two sites, which is in breach of DfT Cycling Infrastructure Design Local Transport Note 1/20.
8. Overall, there has been no Master planning of the cycling routes from Humber Doucy Lane to other locations, nor to connect with existing safe cycling routes. This is insufficient to deliver the active travel requirements of the Local Plan of 15% modal shift. It also fails to meet the sustainable travel requirements of the NPPF and should be rejected accordingly.
9. We object that ID28 was only made available after Brian Samuel presented his statement. If this had been available beforehand then our oral Statement would have included these concerns. This further demonstrates the lack of community engagement and illustrates how public consultation is being avoided.
10. We object that ID28 was only made available after the Highways sessions and therefore avoided verbal scrutiny by the Inquiry.
11. We are extremely disappointed with how Suffolk County Council has approached discussions with the Appellant on active travel infrastructure and how the public have been excluded from these. We note that Suffolk County Councillor Martin was also excluded from these discussions, despite requesting to be involved. We do not believe that SCC has delivered the requirements for sustainable travel (Policies CS5, CS6, CS17 and DM21) and ISPA4 required in the Ipswich Local Plan, which SCC effectively signed up to.
12. Once firm proposals have been developed for offsite infrastructure that are achievable then these should be made available for public consultation prior to any approval of this application.