



## NORTHERN FRINGE PROTECTION GROUP

### Safeguarding the Character of Ipswich

#### WSP/SCC ISPA Local Plan Modelling : Model Run 7 Sensitivity Test

We still have some concerns with the modelling assumptions:

1. The 2026 assumptions in Section 2 omit the proposed 496 homes on Humber Doucy Lane, which, if allowed to be built simultaneously, will increase traffic on the A1214/Tuddenham Road etc.
2. The assumptions exclude any construction traffic and site-worker's vehicle movements to the multiple IGS and Humber Doucy sites, which will have an on-going material impact during peak travel times.
3. It is unclear if the new pedestrian/cycling crossing on Valley Road (between Westerfield-Henley Roads) is modelled, nor how the impacts on the increased use of the existing crossings on the A1214 will impact on traffic flows during peak times and could be material.
4. The modelling appears to assume that the Ipswich modal shift target and the IGS sustainable travel plans are 100% successful, with no sensitivity test. We maintain our concerns that these targets may not be achieved, with the 15% Ipswich modal shift target particularly unrealistic.

In relation to the modelling results:

5. We note that the results show that both Westerfield and Tuddenham Road junctions are heavily congested based on the assumptions in 2026 (which omits all site construction related traffic etc as discussed above) and that several of the link roads are either near or over-capacity in 2026.
6. It is unclear how this over-capacity then feeds back into the model to nearby junctions and other link roads. SCC need to clarify this, particularly whether it has the potential to result in gridlock and whether this would impact on other key junctions along the A1214.
7. We strongly disagree with the comments in Paragraph 3.2.3, as the required mitigation will not have been delivered at the "*earliest opportunity*". It is important to recognise that congestion will worsen during 2027 and 2028, with both junctions and additional link roads likely becoming over-capacity with severe congestion also spreading to other roads. This required infrastructure will not have been delivered in a timely manner and the Plan is unsound.
8. When construction finally commences at these junctions, the congestion and disruption caused would be far greater than if the works had been completed earlier (before reaching over-capacity).

In relation to Air Quality:

9. The Inspectors are already aware of our major concerns with IBC's approach to AQ in the Plan.
10. This Technical Note has not provided any evidence that there will not be a knock-on increase in traffic at the two existing Air Quality Management Areas on the A1214. As the AQ modelling for the IGS already excludes 2021-2025 and all associated construction and site-workers traffic, this is unsound.
11. We are extremely concerned that IBC is now consulting on whether to completely remove one of these AQMAs (despite there being an exceedance in 2019 marginally outside it) and reduce part of the other one. This is without having adequately modelled the impacts of the early years of the multi-site build of the IGS on AQ. Consequently, measurement of the impacts of traffic on air pollution (required to ensure compliance with legal limits) in these areas could cease. This is unsound with respect to Policy DM3 of the proposed Plan and we are concerned with IBC's non-disclosure of this at the Hearings; being a material omission.

We believe both these junction improvements are required to be delivered by 2026 otherwise the Plan is unsound.