

10 September 2019

ipswichnorthernroute@suffolk.gov.uk

Cllr Matthew Hicks
Suffolk County Council
Endeavour House
Ipswich, Suffolk, IP1 2BX

Dear Cllr. Hicks

Ipswich Northern Route Public Consultation

The Suffolk Preservation Society (SPS) is a non-political, independent, self-funding charity whose charitable objects are to promote the conservation, protection and improvement of Suffolk's physical and natural environment for the public benefit. We seek sustainable development that is undertaken sympathetically and to the highest level of design. We are writing to object to the principle of further road building in Suffolk and call for enhanced investment in sustainable modes of transport.

Summary

We applaud Suffolk County Council's declaration of a climate emergency, the setting up in July 2019 of a task force with the specific purpose of addressing climate change and the Council's determination to be carbon neutral by 2030. Perhaps the single most important step that the Council can take to achieve this agenda is to withdraw support for the North Ipswich Bypass proposal, which would result in the building of thousands of homes in an unsustainable location that will require each household to own multiple cars and make multiple car journeys per day for work, daily needs, and leisure. This out of date approach to urban design accelerates climate change, destroys our countryside, and also results in significant heritage harm. The SPS supports the building of new housing but this should be concentrated in our towns, with the objective of regenerating them, using brown field sites in locations that have access to good quality public transport, close to employment, shopping and community facilities.

SPS position on road building

The SPS represents the Campaign for the Protection of Rural England (CPRE) in Suffolk and aligns itself with the values of the national charity, and, in particular, endorses the findings of its recent research [The end of the road? Challenging the road-building consensus - Campaign to Protect Rural England](#) (2017). This compelling document demonstrates that road building not only fails to address congestion. It also creates further demand on road networks. Road building unlocks car dependent development while potentially undermining development in more sustainable locations.

It is frequently claimed that road building stimulates economic growth but careful scrutiny of the evidence of previous road building projects fails to convincingly demonstrate this. Furthermore, and of great importance, road building results in significant environmental damage and causes harm to our countryside.

We believe that increasing road capacity must be the last resort and we support CPRE's call on the Government to adopt an enlightened 'smarter travel' hierarchy as the basis of its transport policy and investment decisions.

We consider that there should be a focus on widening travel choices. Firstly, this should aim to minimise demand by focusing development in towns, around new and existing rail stations. Development should be located to minimise commuting distances and make walking, cycling and public transport the modes of choice. It should aim to widen travel choices by investing strategically in rail and light rail corridors, to unlock land for housing and employment, and in high quality walking and cycling routes. Furthermore, it should aim to improve efficiency, including through road pricing, with revenues raised invested in high frequency public transport on the same corridors to reduce car-dependency, and increasing occupancy, such as through car sharing and more efficient freight transport. It is only as a last resort that the capacity of our road networks should be increased.

Ipswich Northern Route as facilitator of housing growth

The consultation documentation states an aspiration to deliver 10,000-15,000 additional dwellings over and above that which has been allocated in the adopted and emerging Suffolk Local Plans. The SPS strongly objects to the principle of releasing countryside for development of houses where a case for meeting housing need has not been met. This approach is fundamentally unsustainable and represents an unacceptable loss of countryside with all the associated negative impacts of major road building. Any allocation of land for housing should be plan led and fully scrutinised and consulted upon via the Local Plan process and aim to release only that which is required to meet the housing needs of the county and not as driver for economic development.

Furthermore, The SPS considers that it is deeply unfair on local communities to be asked to comment on three road building scenarios which have not undergone proper scrutiny and analysis through the site allocation process. This is resulting in significant distress being felt by residents and business owners in predominantly small rural communities.

Cultural heritage and landscape impacts

The study area has a rich built environment and all three scenarios will result in significant harm to Suffolk's natural and built heritage. The Parsons Brinckerhoff study states that the area includes a total of 116 designated listed buildings across the ten parishes of Grundisburgh, Akenham, Westerfield, Tuddenham St Martin, Playford, Little Bealings, Great Bealings, Rushmere St Andrews, Claydon and Witnesham. The constraints map fails to identify these in a meaningful way and closer assessment of all three scenarios includes direct and indirect impacts affecting a much wider geographic area over at least 20 parishes including Ashbocking, Barham, Boulge, Coddendam, Culpho, Gosbeck, Hasketon, Hemingstone, Kesgrave, Martlesham, Swilland and Woodbridge.

The study area also includes three designated conservation areas (Coddenham, Tuddenham and Grundisburgh) and 10 Scheduled Ancient Monuments, all of which cannot be identified from the constraints map as no schedule of sites has been included. The Parsons Brinkerhoff study merely shows a scatter of tiny dots on a largescale map at a scale that makes interpretation impossible. This paucity of accuracy and detail renders the consultation exercise to a mere popularity contest rather than a thorough assessment of environmental impacts on which to base an informed and defensible opinion.

However, closer assessment by SPS reveals that the Outer Route (Northern Option) directly affects the Gipping Valley Special Landscape Area together with ancient woodland at Blower's Pightle Grove, Coddenham, while a suite of ancient woodland at Coddenham Wood, Long Strops, Gosbeck Wood would all be within 500m of the route. Designated heritage assets in Coddenham including Choppins Hall and barn together with The Orchard House at Gosbeck are all in close proximity to the route. The Southern Option will also directly impact upon The Gipping Valley Special Landscape Area and is in close proximity to Borley's Wood and Bulls Wood, Barham which are blocks of ancient woodland. The Coddenham Conservation Area will suffer a direct impact and the route will impact upon the setting of at least no.13 designated heritage assets in Coddenham, Hemingstone, Swilland, Clopton and Burgh including Choppins Hall, grade I, Old Hall Farmhouse, Hemingstone grade II* and Church of St Mary, Swilland also grade II* and the Scheduled Ancient Monument at Witnessham.

The Middle Route will have a direct impact upon the Gipping Valley Special Landscape Area, North Ipswich Special Landscape Area and will be in close proximity (700m) of the Grundisburgh Conservation Area. Numerous blocks of ancient woodland including Blunts Wood, Hasketon and blocks of TPO'd trees at Great Bealings will also be directly impacted. Based on the information provided it seems likely that there will be a direct impact upon some designated heritage assets in Grundisburgh and Witnessham but at the very least it is clear that the setting of at least 27 designated heritage assets will be affected including the Church of St Mary, Akenham grade II* and Seckford Hall, Great Bealings grade II* and Grundisburgh Hall and ancillary buildings and parkland grade II.

The Inner Route is likely to have a direct impact upon the North Ipswich Special Landscape Area as well as protected woodland at Martlesham, Playford and Little Bealings. Based on the limited information available the setting of at least four designated assets will also be affected.

The SPS is concerned that the supporting study by Parsons Brinkerhoff is inadequate, lacks a meaningful level of detail and fails to make a balanced assessment of the environmental sensitivity of the study area. Despite the lack of detailed information the consultation documents state that construction methods will be used to mitigate harmful landscape impacts. Such glib assertions in the absence of any meaningful study make it difficult to have confidence in such conclusions. The SPS considers that all three routes, with variations, will have harmful impacts upon the historic landscapes and heritage assets both directly and indirectly. For this consultation exercise to be effective and to result in meaningful conclusions, the environmental constraints should be fully identified and clearly stated at this early stage. Anything less risks misleading public opinion.


Conclusion

The SPS considers that a suitable approach to easing congestion in and around Ipswich should focus on how to improve and upgrade existing roads and sustainable modes of transport. Suffolk councils should focus explicitly on keeping roads in good repair and reducing their environmental impacts, rather than increasing capacity. This would make our transport system more sustainable and efficient by reducing reliance on cars, cutting carbon emissions and improving air quality. The SPS supports strategic transport improvements to known weak spots including wind resistant measures on the Orwell Bridge and improvements to the A14 especially around Copdock. In addition, improvements to the rail network and increased bus services would all serve to materially address congestion at peak times while safeguarding our county's countryside.

New road capacity should only be considered if these options have been fully implemented; if environmental limits would not be exceeded; and if measures are put in place to lock in the benefits of the additional capacity.

I trust that you will find these comments helpful.

Yours sincerely



Andrew Fane
Chairman

cc: Parishes of Akenham, Ashbocking, Barham, Boulge, Claydon, Coddendam, Culpho, Gosbeck, Great Bealings Grundisburgh, Hasketon, Hemingstone, Kesgrave, Little Bealings, Martlesham Playford, Rushmere St Andrews, Swilland, Tuddenham St Martin, Westerfield, Winesham and Woodbridge.

MPs Dan Poulter, Sandy Martin

STOP Campaign

Ipswich Society