Dear Annette and Luke,

I acknowledge Luke’s corrections. The Inspector requested comments on the implications of the documents. Referring to Luke’s two corrections, I would invite the Inspector to note the following implications:

1. **This statement is not correct, it is the parallel link road that has capacity issues, not the A14. As the two roads are very close at this point it is understandable that this was misinterpreted.** This is this parallel link road which Trinity College proposes to use for access to the west bound A14 carriageway in its proposal for Phase 2 Innocence Farm, i.e. utilising a new bridge over the A14. The capacity issues are therefore very relevant to Innocence Farm. The reference to this is Trinity College’s response to the Final Draft Local Plan, specifically their document titled “REPORT, Innocence Farm, Trimley St Martin, Regulation 19 - Transport Technical Report, Client: Trinity College Cambridge, Reference: PB8811-RHD-ZZ-XX-RP-Z-0001, Date: 25 February 2019, Royal Haskoning DVH.

2. **This is only true of some of the J58 junction approaches, others are still operating within capacity in the 2036 modelling.** Examining the H31 document traffic diagrams, it is some approaches to the J58 junction roundabout that are over capacity (classed as red). The A14 over pass over the J58 roundabout is not over capacity. Trinity College’s proposed Phase 1 for Innocence Farm (not implementing the new A14 bridge) would require traffic and goods to leaving the port towards the rest of the country to ‘trombone’ around the J58 junction in order to visit Innocence Farm, rather than progress straight over the A14 over pass. This would create new traffic on the roundabout exacerbating the forecast capacity issues.

Best wishes,
Jack Cade

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Dear Annette and Jack,

Apologies, there are two slight errors in the email exchange below that I should have corrected, see below additional comments in **RED** below:

Regards

Luke

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From: Luke Barber  
Sent: 25 October 2019 16:30  
To: Jack (Ian) Cade; 'Annette Feeney'  
Subject: RE: Inspector’s consultation
To: 'Annette Feeney' <Annette.Feeney@eastsuffolk.gov.uk>
Cc: Luke Barber <[Redacted]>
Subject: RE: Inspector’s consultation

Dear Annette,

Copy to Luke Barber, Suffolk County Council

Than you for the invitation to comment on the implications of the traffic modelling documents numbered H30/31/32. My response is below.

You will see that the format of my comment is an email exchange between me and Luke Barber from Suffolk County Council, this consists of four statements each of which is followed by a response by Luke, in blue. Our intent is to provide some additional clarification to the documents which the Inspector may find helpful.

Best wishes,
Jack Cade

Luke Barber <[Redacted]>

Sent: 24 October 2019 11:37
To: Jack (Ian) Cade <[Redacted]>
Cc: Cameron Clow <[Redacted]>
Subject: FW: Draft - response to Inspector

Dear Jack,

I’ve added some additional answers to your queries. I’m not sure that we would be entering into a formal agreement on this, but you are welcome to share these email exchanges with Annette and the PINS team.

Regards

Luke

1. H30/31/32 do not include the trips input data. This information is in D31, Appendix D. The trip information and output forecasts are estimates of AM and PM peak hour traffic, not the total daily forecast.

   H30/1/2 are the strategic WSP modelling reports, they do not deal with site specific trip generation. Yes, D31 deals with the site specific details of the sites in the local Plan. The traffic analysis is all related to the AM and PM traffic peaks, but Air Quality assessments consider the daily impacts, although this is a district matter not specifically SCC. Assessing the most onerous traffic situation in the AM and PM peak hours is a standard approach to traffic modelling for a district level assessment. The TA process would consider local factors and the operation of the site in far more detail.

2. The Local Plan modelling tests the full plan at a district level, but does not test the impacts at local junctions, such as Innocence/Crofts Lane. A future potential Traffic Assessment will be more refined than these high level assessments, and more focused on local highway network impacts.

   The traffic modelling includes all of the existing and proposed main junctions in the Innocence Farm area, but not to the same level of detail as a TA level assessment. This is an appropriate level of assessment for a district level strategic review, the TA would consider the form of junctions and the overbridge link road in a far greater level of detail, once the full technical details of the scheme are known.

3. The modelling has been run on the assumption of an all-movements junction for Innocence Farm, and with this forecasts that both the A14 adjacent to Innocence Farm and junction 58 will be V/C >85% in 2026, This
statement is not correct, it is the parallel link road that has capacity issues, not the A14. As the two roads are very close at this point it is understandable that this was misinterpreted. and for junction 58 V/C >100% in 2036. This is only true of some of the J58 junction approaches, others are still operating within capacity in the 2036 modelling.

Yes, the traffic modelling is based on the full employment quantum and the full mitigation scheme (all movements junction), phasing of delivery is a matter for the Planning Application / Development Management process. The LP process is to test the delivery of the full allocation, but a phased approach might lead to other impacts which have not been fully assessed at this time. J58 is clearly under pressure in several of the scenarios, and this is partly down to organic traffic growth on the network, as well as site specific development impacts. We will continue to work with Highways England on the best approach to mitigating strategic impacts around Suffolk. We have factored the known mitigation scheme into the modelling, and a degree of demand reduction will also be needed to fully mitigate the impacts.

4. Not implementing the all-movements junction and relying on a single left in/left out access would potentially triple the amount of traffic on the A14 compared to the modelling, for those HGVs using Innocence Farm. Example from the Port; from the Port to Seven Hills (junction 58) via A14, back from junction 58 to Innocence Farm via A14 for parking/rearrangement, then out of Innocence Farm via A14 to the Dock Spur roundabout (junction 60) via A14, then Dock Spur roundabout to exit the peninsula, via A14.

While we do not recognise the ‘triple’ impact statement, but it would clearly be unacceptable to serve the majority of the site from the existing junctions, with corresponding increases in journey times and distances on the A14 for vehicles having to use J58 to U turn. We have stated that phasing of infrastructure is a key consideration of the application stage, and we will scrutinise any further traffic projections at this time. The focus of the LP modelling is to test the full plan / full mitigation scenario, which has been done. It doesn’t preclude further analysis being required as the project progresses, and we would expect a far more detailed assessment to accompany the planning application, for further detailed review.

From: Annette.Feeney@eastsuffolk.gov.uk
Sent: 08 October 2019 10:56
Subject: Inspector’s consultation

The Council in its statements has referred to several documents which were published alongside their hearing statements. As representors have not had the chance to comment on these, the Inspector has decided to initiate consultations, to assist him in the examination. The purpose of these consultations is solely for representors to state briefly the implications, if any, that the publication of these documents may have for their cases.

Hearing document H20 East Suffolk Housing Land Supply Statement and Appendices
The Inspector therefore invites representors who have commented in respect of the supply of housing within the Suffolk Coastal Local Plan area to consider whether they wish to provide a brief additional submission concerning the implications of the publication of the East Suffolk Housing Land Supply Statement and Appendices (Hearing document H20) on their stated positions. Any supplementary submissions, including any material contained within appendices shall have a maximum word count of 1000 words, and the word count must be stated within the document. Any material in excess of the word limit or relating to any other matter will be declined.

All additional submissions must be received by 5.00 PM on Friday 1 November 2019.

Hearing Documents H30, 31 and 32 H30 Ipswich Strategic Planning Area Local Plan Modelling
The Inspector therefore invites representors who have commented in respect of the provision of housing and employment land in the Plan, the provision of transport infrastructure and the spatial strategy to consider whether they wish to provide a brief additional submission solely concerning the implications of the publication of the following documents for their stated position:

H30 Ipswich Strategic Planning Area Local Plan Modelling Methodology Report, WSP, August 2019
Any supplementary submissions, including any material contained in appendices shall have a maximum word count of 1000 words which must be stated within the document. Any material in excess of the word limit or relating to any other matter will be declined. 
All additional submissions must be received by 5.00 PM on Friday 1 November 2019.

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