Mr Stephen Baker Chief Executive East Suffolk Council Station Road Melton Woodbridge IP12 1RT

Dear Sir,

Campsea Ashe PC, together with other PC's represented in the Joint Parish Traffic Initiative (JPTI) have over the past few years been engaged in trying to resolve the serious traffic capacity issues linked to the Bentwaters/Rendlesham area.

Whilst researching data and documents linked to the issues, we have found clear indications, that the process of establishing the Suffolk Coastal Local Plan (adopted 23rd September 2020) seems to have been misused by the Planning Department. It appears, that ESC Planning officers misrepresented key findings of the WSP Local Plan Modelling Report (2019, Forecasting Report Vol2, Suffolk Coastal & Ipswich Preferred Option) and omitted or mispresented past statements by various authorities and inspectors, as well as historic knowledge and information, to argue for the adoption of the Local Plan 2020. The serious concerns known and highlighted in the WSP report were not conveyed in the published document nor during public hearings to the Inspector of the Local Plan.

With regards to facts, statements and information that have recently come to light and which give deep concerns, we hereby formally make a complaint against East Suffolk Council in respect of matters used to further the adoption of the Local Plan and request an investigation and enquiry in to this matter.

Campsea Ashe Parish Council request an inquiry into all statements made by ESC Planning in support of the Local Plan. These statements, including those MADE LATER (March 2021) by the Chief Planning officer, seem to contradict (misrepresent) findings and summaries made by the traffic consultants WSP to the Local Plan, as well as known capacity issues highlighted historically prior to the WSP report.

Our key points as also illustrated in the appendixes are;

- 1 The published Local Plan 2020 has not acknowledged, that in fact there are serious traffic capacity concerns at several junctions in the Woodbridge $\!\!\!/$ Melton area, as was highlighted in the WSP report.
- 2 Furthermore, it had also been witnessed during the Public Hearing of the Local Plan (Tuesday 17th September 2019), that the representative of the LPA stated (in response to the Inspector asking of any known issues related to traffic capacity) that there were 'no known problems on the A1152' affecting the proposed plan.
- 3 Historic information, like the letter from SCC to ESC (SCDC, DC/17/2512/OUT) ref:-570\CON\2242\17 part 2 (dated 10/07/2017) stating that "the Melton Cross roads junction is at capacity and even modest increases in traffic flows may result in severe congestion" was not given any consideration. The content of this letter should have been made known to the inspector.
- 4 Further clear historic knowledge (within ESC planning) of traffic capacity concerns are also linked to the regularisation of Bentwaters, C/10/3239; 80% of build had to be given retrospective Planning permission, including the illegally doubled capacity of the Anaerobic Digester increasing feed requirements from 32kt to 70kt. This includes the SORRS (Safe Our Rural Roads) initiated traffic limiting attempts by local PC's for the Bentwaters/Rendlesham area, underlining the huge concern traffic volumes created well over 15 years ago.

5 Local PC's and Cllr's have in the past 20 years consistently and repeatedly expressed concern and opposition to larger developments, citing known traffic capacity issues in the area. With no infrastructure improvements since, these concerns remain unchanged.

6 In 1999, a government appointed inspector refused the application for an airport at Bentwaters Park, Rendlesham, and his reasons linked to the site are still relevant today, given the considerable expansion of the business park in the intervening years. Quote from his report:

"Turning to the problems on the roads, I have serious concerns about the suitability of the A1152 to handle any significant increase in traffic flows, particularly if HGVs were to form a major component of that increase. I believe that Melton and Eyke would be badly affected."

7 Additional impacts for the area over the coming 15 years or so, emanating from the Sizewell C and the other six renewables energy building projects, have not been taken into account (by WSP).

Summary.

We believe that the statements and facts presented in this document support our request for inquiry / investigation. It is not just a question of openness, honesty and transparency (democratic) in government, but also of integrity. It must be seriously considered, that the Local Plan may have been conceived with the use of manipulation / misinformation, by suppressing crucial information and facts, that might have otherwise led to a different outcome for the area.

The WSP Traffic Modelling Report consistently shows that there are traffic issues. The scope for use of mitigation measures such as signal optimisation is stated as being limited. There are no magic roundabouts or traffic lights. This is not the case of the odd junction that is critical and is at capacity, but almost all major junctions will be at, or over capacity.

Furthermore, the WSP report does not factor the building of Sizewell C Nuclear Power Station, nor the progressing renewable energy projects, all of which are deemed by themselves to become contributors / causes of major traffic problems.

It is worth remembering the statement made at the Public Hearing of the Local Plan on Tuesday 17th September 2019, when planning officers, in response to the Inspector asking of any known issues related to traffic, stated - <u>'There are no known problems on the A1152'</u>

Within the next five years work begins on the next Local Plan. It begs the question "What is the future of Suffolk and future generations"?

If it is to be one of urbanisation and industrialisation, then it should it be openly discussed with full transparency and public involvement. But it should not be in the manner in which the present Local Plan has been created.

Given the facts stated above, we ask for an inquiry into whether the Planning Officers correctly presented the facts provided by consultant WSP (and previous known published concerns) and therefore could be said to have misrepresented facts to the Planning Inspector, which ultimately led to the acceptance of the Local Plan.

Attached are appendixes which support our request for an inquiry and are to be included in the investigation.

Yours faithfully

Appendix I

- 1 WSP Local Plan Traffic Modelling Report 2019; Forecasting Report Vol 2 Ipswich & Suffolk Coastal Preferred Option.
- 2 Public Hearing Local Plan, 17th September 2019

Appendix II Historic Knowledge of Issues

- 1 Letter from SCC to ESC ref:DC/17/2512/OUT; 570\CON\2242\17, part 2, 10/07/2017
- 2 Statement by Chief Planning Officer ESC Mr P Ridley, March 2021
- 3 Network Rail, Melton level crossing safety issues
- 4 Physical Observation in the Melton area
- 5 Airport at Bentwaters Park
- 6 Historic local PC's highlighting traffic concerns
- 7 Historic issues linked to Debach / Planning Departments handling of major industrial developments

Appendix III. Bentwaters / Local Plan.

- 1 Regularisation of Bentwaters; C/10/3239; DM06/14
- 2 Minutes from CA PC meeting 9/1/2012 re Bentwaters; Judiciary Review discussion

Appendix IV Statements by Chief Planning officer ESC, Mr P Ridley.

1 Transcripts of Zoom meeting recording March 2021

Hard and email copies to:-

SCC & ESC Councillors representing Campsea Ashe

Councillor Steve Gallant. :- steve.gallant@eastsuffolk.gov.uk

Councillor Rachel Smith-Lyte: - rachel.smith-lyte@eastsuffolk.gov.uk

Councillor Peter Byatt:- peter.byatt@eastsuffolk.gov.uk

Councillor Kay Yule: - kay.yule@eastsuffolk.gov.uk

Appendix I

1 The 2019 WSP Local Plan Modelling Report (Forecasting Report, Vol 2, Ipswich & Suffolk Coastal Preferred Option) and statements by Planning Officers at Public Hearing of the Local Plan 2020

This report does not take into consideration the effect of the building of Sizewell C which will take some 15 years to build, nor of the progressing renewable projects (6) in the area.

East Suffolk Council have stated that the WSP Traffic Modelling Report supports the preferred option to building of 13298 houses within the next 13 years.

The report does not make any recommendations or support East Suffolk Councils statement. It does however clearly indicate that there are and will be traffic problems.

The Traffic Modelling Report was professionally carried out by WSP, which is a Canadian based global company of engineers, planners, designers and researchers, with offices in the UK. This report makes clear that with mitigation and signal optimisation junctions will still be over capacity.

The quoted references from the report highlight parts of the report which give serious concerns. Your attention is drawn to various tables showing degrees of capacity saturation and from this one can see examples from 101% - 152% degrees of saturation on various junctions. For example, the roundabout A12/B1079 - 'Dobbies' roundabout on pages 75-77; the traffic modelling raises serious concerns (F= exceeded capacity), as does Melton Cross Roads (pages70-72).

QUOTE; Conclusion to the WSP Traffic Modelling Report dated January 2019

When applying the full level of increased demand to the local highway network (i.e. Model Run 8), most junctions begin to exceed capacity. Whilst several mitigation measures have been applied, such as signal optimisation and existing junction mitigation proposed designs, most junctions still exceed capacity, implying that further testing and mitigation is required. It is likely that a full timing review (including cycle times) would give a strong initial indication as to potential junction performance, but potentially more significant junction re-designs may be required, including significant layout changes and / or prohibited movements, to ensure that these local junctions can accommodate future traffic demand levels.

Due to available information, input data to calibrate these models has been limited, and therefore a number of reasonable assumptions have been made, and the results should be treated as indicative only.

Extracts (mainly just concerning Suffolk Coastal) from the report:-

WSP LOCAL PLAN MODELLING FOR BABERGH & MID SUFFOLK, IPSWICH AND SUFFOLK COASTAL; detailed list of traffic issues

Figures: - Pages 8 & 9 of 77

January 2019 Project No.: 70044944 | Our Ref No.: MR 3.1

Figure 1 - Ipswich Borough boundary 7

Figure 2 - Suffolk Coastal District boundary 8

Figure 3 – Saxmundham – MR8 without TUOC, Links with V/C over or near capacity 18

Figure 4 - Melton - MR8 without TUOC, Links with V/C over or near capacity 19

Figure 5 – Felixstowe – MR8 with TUOC, Junctions with Overall V/C over or near capacity

20

Figure 6 - Felixstowe - MR8 without TUOC, Junctions with Overall V/C over or near

capacity 21

Figure 7 – Felixstowe – MR8 with TUOC, Links with V/C over or near capacity 22

Figure 8 - Martlesham & Woodbridge - MR8 with TUOC, Junctions with Overall V/C over or near capacity 24

Figure 9 - Martlesham & Woodbridge – MR8 without TUOC, Junctions with Overall V/C over or near capacity 25

Figure 10 - Suffolk Coastal, Felixstowe to Ipswich – MR8 with TUOC, Junctions with Overall V/C over or near capacity 26

Figure 11 - Suffolk Coastal, Felixstowe to Ipswich - MR8 without TUOC, Junctions with Overall V/C over or near capacity 27

Figure 12 - Suffolk Coastal, Felixstowe to Ipswich – MR8 without TUOC, Links with Overall V/C over or near capacity 28

Figure 13 - Suffolk Coastal, Innocence Farm – MR8 without TUOC, Links with Overall V/C over or near capacity 29

Figure 14 - Ipswich - MR8 with TUOC, Junctions with Overall V/C over or near capacity

Figure 15 - Ipswich - MR8 No TUOC, Junctions with Overall V/C over or near capacity 31

The area included by this report encompasses Babergh, Ipswich,Mid Suffolk and Suffolk Coastal. The total number of houses by 2036, using the preferred options will be: **42,786.** Suffolk Coastal (ex SCDC now ESC = East Suffolk District Council) using the preferred option the contribution will be: **13,298**

Page 36 of 77. Melton cross roads.

3.4.7.(part)

The A1152 Woods Lane / B1438 Melton Road / Wilford Bridge

The northern and eastern approaches present link V/C significantly over capacity and as such delays are likely to be experienced at this junction.

Page 41 of 77:-

3.4.22.Martlesham / Woodbridge.

This location does not include any potential major growth locations, however it is included as the modelling results indicate locations in this area along the A12, Foxhall Road and B1438 with capacity issues.

Are there not 2,000 house to be built at Martlesham?

Page 42 of 77:-

3.4.24. Within Woodbridge, it is shown that the A12 / B1079 priority controlled roundabout (node 50053) has

a V/C exceeding 100% in the PM peak and between 85-99% in the AM peak. During the PM peak, three of the four arms have turning movements exceeding 100% with only the western approach operating within its theoretical turning capacity. During the AM peak, V/C over 100% is demonstrated on the northern and western approaches to the roundabout, for all turning movements.

Page 51 of 77:-

3.5.18. The A14 junctions around Ipswich all show capacity problems as a result of cumulative impact and not just Local Plan implementation.

3.5.24 It should be understood that if the congestion is mitigated at a particular location it could create traffic issues at adjacent locations due to the additional traffic which gets attracted, essentially moving the problem further along.

Page 70-72 of 77: (Also shown are the degrees of saturation)

Junction 3 Melton Crossroads:- the junction exceeds capacity on several approaches, as shown in Tables 9 and 10. For this junction - up to 129.2 degrees of saturation can be expected.

Page 73 of 77:-

Junction 4: Saxmundham Crossroads:-

Utilising the current signal timings, the junction would operate over capacity in the model run 8. This is shown in Tables 15 and 16 below.

Page 75 of 77:-

Junction 5: A12 Grove road / B1079 Grundisburgh road. (Dobbies roundabout)
The model shows the junction performs poorly in both the Tempro and Model Run 8 scenarios,
where the roundabout exceeds capacity on three of the four arms in the AM peak, and all four
arms in the PM peak.

5 In traffic engineering, the Ratio of Flow to Capacity (RFC) for a signalised junction is a commonly used measure of its available spare capacity. The Ratio of Flow to Capacity is related to the degree of saturation of a traffic signal junction.

6 Level of service (LOS) is a qualitative measure used to relate the quality of motor vehicle traffic service. LOS is used to analyse roadways and intersections by categorising traffic flow and assigning quality levels of traffic based on performance measure like vehicle speed, density, congestion, etc. LOS is measured on a scale from A to F, where A indicates a junction has significant levels of spare capacity (typically operating under 85% capacity), with the rest of the letters indicating a sliding scale to the worst level of performance at F, where the junction has exceeded capacity. Any approaches therefore labelled between D and E are operating near the peak of capacity and should be deemed unlikely to be able to accommodate future flow growth without mitigation.

The junction A12 Grove Road/B1079 Grundisburgh Road (Dobbies roundabout) is shown as F.

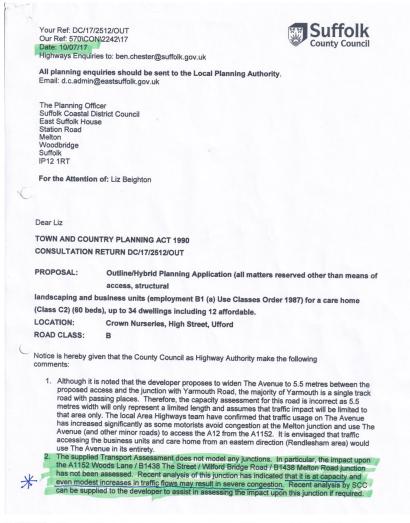
2 At the Public Hearing of the Local Plan Tuesday 17th September 2019, which was attended by members of Eyke Parish Council, who witnessed officers from the East Suffolk

Council state, in response to the Inspector asking of any known issues related to traffic - There are **no** known problems on the A1152'. (Lacking currently a precise transcript of this public hearing, the councillors of Eyke PC are willing to sign a sworn affidavit to this effect) This is a key statement, showing a total disregard of the finding of the WSP report, as well as the inherent historic knowledge the Planning Office has over traffic issues in that area.

Appendix II Historic knowledge within the Planning Office of existing problems

1 Letter from SCC to ESC re DC/17/2512/OUT, ref:- $570\CON\2242\17$ - part 2 - dated 10/07/2017 states:

'The supplied Transport Assessment does not model any junctions. In particular, the impact upon the A1152 Woods Lane/ B1438 The Street/ Wilford Bridge Road/ B1438 Melton Road junction has not been assessed. Recent analysis of this junction has indicated that it is at capacity and even modest increases in traffic flows may result in severe congestion. Recent analysis by SCC can be supplied to the developer to assist in assessing the impact upon this junction if required.'



3. Visibility from The Avenue, particularly in a northern direction onto High Street is limited due to the topography of the roads and verges, and several large trees. It appears to be less than the required 90 metres in this location (DMRB TD 9/93). Intensification of use of this junction movement may be detrimental to highway safety due to the limited visibility.

Mr Ben Chester

Yours sincerely.

Senior Development Management Engineer
Strategic Development – Resource Management

2 At the March 10th, 2021 Joint Parish Traffic Initiative (JPTI) zoom meeting, with councillors and officers of SCC (Highways) and ESC (Planning), Mr Phillip Ridley the chief planning officer stated:

"In terms of Melton crossroads that all development on the peninsular has been considered as part of the Local Plan. The Local Plan is seeking to balance social, economic and environmental issues appropriately. In the planning context and in highways terms, there have been no markers in the sand, that the quantum of traffic going through Melton crossroads is beyond capacity, requiring necessary upgrades to the highway infrastructure. If that were the case then what may or may not have gone through the Local Plan may have been completely different."

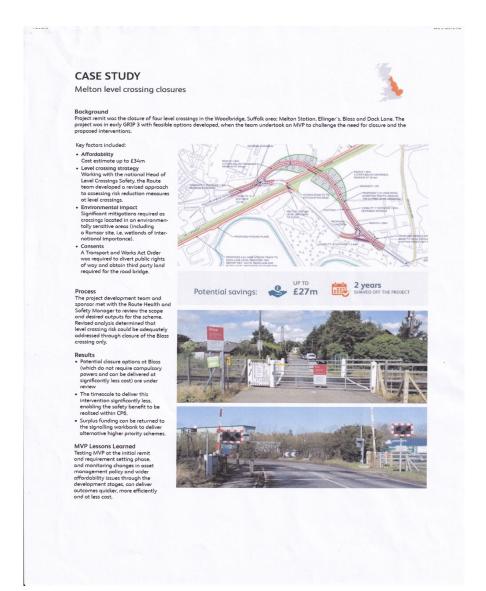
As illustrated before, the WSP Traffic Modelling Report consistently highlights problems at most major junctions, as does this 2017 document. Mr Phillip Ridley's statement is in complete contradiction not only to the WSP report and does seem to lay the ground for further unlimited development at Bentwaters, something most neighbouring parishes have been very concerned about since the mid 2000's.

Note re JPTI; In 2019, as a result of Bentwaters / Rendlesham area traffic issues and the constant neglect of those issues being appropriately reflected in planning terms, a Joint Parish Traffic Initiative had been created by eight Parishes, currently consisting of Melton, Bromeswell, Ufford, Eyke, Rendlesham, Tunstall, Snape & Campsea Ashe.

Other PC's are interested in the work and progress of that group.

3 NETWORK RAIL - Melton Level Crossing

Network Rail have been concerned for some time about the problems on the A1152 and have been looking at possible solutions in how to defuse the unsafe level crossing on the A1152. They considered and initiated for example the proposal of the building of a bridge at Melton level crossing, which was finally cancelled (March 2022) due to the cost of £27million.



4 Physical Observation in the Melton area over the past 5 years

Traffic is frequently backed up from Melton Crossroads to the old council offices and on the A1152 the traffic on daily basis backs up from the Melton lights to beyond the Wilford bridge and not infrequently to the Bromeswell Pub "The Unruly Pig".

The Council Offices are situated at Melton railway crossing, where traffic on most days back up to the A1152 and B1083 roundabout. This – one imagines - can be observed daily from the offices; surely one officer at least must have noticed the problem.

Additionally, in many places the A1152 is only 5.5 metres wide. Roads suitable for such heavy HGV demand are deemed to require 5.8 (2.9 lane width).

5 Airport at Bentwaters Park

In 1999, a government appointed inspector refused the application for an airport at Bentwaters Park, Rendlesham, and his reasons are still relevant today, given the considerable expansion of the business park in the intervening years.

Ouote from his report:

"Turning to the problems on the roads, I have serious concerns about the suitability of the A1152 to handle any significant increase in traffic flows, particularly if HGVs were to form a major component of that increase. I believe that Melton and Eyke would be badly affected."

6 Local Parishes consistently highlight traffic concerns

Over the past 15 years local parishes (Melton, Eyke, Rendlesham, Tunstall, Campsea Ashe, Snape,..) REPEATEDLY pointed out infrastructure being perceived as insufficient to accommodate safe and sustainable traffic levels. Those concerns were expressed even stronger during the SizewellC consultation process. SCDC/ESC were fully aware of those. PC's like Eyke have consistently queried and complained about the inappropriateness of the A1152 for such levels of traffic.

7 Additional historic background info re ESC Planning and its handling of Debach Industrial Estate, again seemingly outside regular planning parameters;

Debach (= Bentwaters owner) had exceeded extensively a planning application remit. Local residents and Parish Council repeatedly complained, which were not acted upon. The matter was finally brought to Planning Committee South, which approved enforcement. However, over an eight-year period, that enforcement was astonishingly never enacted (by SCDC Planning) and subsequently passed statutory time limit, with the development becoming 'legal'. At a subsequent meeting, SCDC was accused of wilful negligence and the Head of Planning subsequently resigned over the matter.

The main concern - traffic impacts on rural unsuitable roads to service a major industrial estate - again were voiced by the local PC's.

Appendix III. Bentwaters / Local Plan.

1 The Bentwaters Industrial Park site covers some 390 hectares (964 acres) and has the potential to be one of the largest industrial sites in the UK and is wholly within the A.O.N.B. (Area of Outstanding Natural Beauty) and is served by the A1152.

The A11052, which was formally the B1069, is deemed to be a rural road, as stated in a meeting at Endeavour House with SCC highways 21/01/2019.

At the inspection of the Local Plan in 1999, the inspector stated:-

"Turning to the problems on the roads, I have serious concerns about the suitability of the A1152 to handle any significant increase in traffic flows, particularly if HGVs were to form a major component of that increase. I believe that Melton and Eyke would be badly affected."

Bentwaters planning application for Anaerobic Digester 2008 (granted 2010) for a 2MW plant (2 -domes). The AGRI Gen / Bentwaters owners actually build a 4 dome / 3.7KW facility, for which retrospective permission was submitted and granted in 2014. It appears, 80% of the building mass at Bentwaters was granted retrospective permission (sic!), quite extraordinary, considering the expressed local concerns re impacts.

C/10/3239; DM 06/14 Regularisation of Bentwaters

When ratifying the application DM 06/14 on 13th November 2014 for the regularisation of Bentwaters, the following conditions relating to traffic were implemented:-

No more than 690,000 vehicles shall enter or leave the site in any calendar year. The monthly average of 57,500 shall not be exceeded by more than 10% in any calendar month. The daily

level of 2300 shall not be exceeded by more than 20% on any day unless otherwise agreed in writing by the LPA. Reason: To maintain control over vehicle movements in the interests of residential amenity and highway safety. Note: based on 'worst case' presented by highway consultant (rounded upwards), based on 25-day month. If a 30-day month figure is used, the monthly figure would be 69,000; yearly total 828,000.

The East Suffolk Council local plan incorporates the building of 13,298 houses (preferred option) creating 13,472 jobs. To support this plan the development and expansion of industry is necessary. And a possible reason for the misrepresentation could be that the development and expansion of Bentwaters is pivotal to ESC and with it its L/P.

However, the original planning condition that limits the traffic in and out of Bentwaters – something that was obviously regarded as necessary at the time- will be limiting development. This condition would need to be negated.

The statement made by Mr Phillip Ridley at JVTC zoom meeting, March 2021.

"I also do need to make it clear that there isn't necessarily a finite quantum of development at Bentwaters that the policy looks to, alternative or additional applications may come forward and we need to consider them on their merit having regard to numerous factors including traffic generation and whether the roads are capable of taking the increase in traffic."

This statement would indicate, that the removal of the planning conditions on Bentwaters is part of the East Suffolk Council's agenda and it could be achieved by use of the (in essence manipulated) Local Plan 2020. Basically, the actual real and perceived traffic problems would need to be hidden. Hence the misrepresentation at the inspection of the Local Plan (there are no known problems on the A1152) would be necessary.

2 Discussion within CA PC re Parish Links (a former joint Parishes Initiative) and concerns about Bentwaters (traffic impacts)

Minutes from the Campsea Ashe PC meeting Jan 9th 2012, Agenda item 5/ Planning; 'Re Bentwaters; Chair RK reported there was doubt expressed as to the actions of SCDC in its handling of the matter today (previous agenda point - Bentwaters). <u>Parish Links has suggested taking the matter to judicial review</u>." Due to costs, that was never progressed.

Appendix IV

Statements by chief planning officer, Mr Phillip Ridley

Statements made by Mr Phillip Ridley at JPTI zoom meeting, 10^{TH} March 2021, are of serious concern, as they indicate that there is no finite level of development for the Bentwaters / Rendlesham area, regardless of already existing traffic problems. The Local Plan is being used to justify that strategy.

At 32 minutes and 49 minute of the audio taped video conference, the following statements are not necessary in time order.

- 1 / "in terms of Melton crossroads that all development on the peninsular has been considered as part of the Local Plan. The Local Plan is seeking to balance social, economic and environmental issues appropriately. In the planning context and in highways terms there have been no markers in the sand, that the quantum of traffic going through Melton crossroads is beyond capacity requiring necessary upgrades to the highway infrastructure. If that were the case then what may or may not have gone through the Local Plan may have been completely different."
- 2 / "The 2015 permission for Bentwaters was reaffirmed in the 2020 Suffolk Coastal Local Plan along with the allocation that might be talked about at Rendlesham and a whole series of other allocations."
- 3 / "As part of the consideration about would have been the strategic implications of highway capacity and highway safety looking at those matters and there were no principal objections to the Local Plan on highway capacity or safety terms coming forward."
- 4 / "The principal of the existing quantum of development at Bentwaters has been accepted along with all the other allocations within the Local Plan.

In items of the general quantum of activities at Bentwaters in and around Rendlesham, from a planning authority's perspective generally, matters are OK. The 2015 permission has got in place the template for further working."

5 / "I also do need to make it clear that there isn't necessarily a finite quantum of development at Bentwaters that the policy looks to, alternative or additional applications may come forward and we need to consider them on their merit having regard to numerous factors including traffic generation and whether the roads are capable of taking the increase in traffic."