

Matter 3: General Questions, Etc – Ian Cowan Response

Unnumbered: Site allocation justifications

Individually, most sites are difficult to argue against. However, three arguments stand out, being Housing Needs, Windfalls and Creeping Normality. These are explained in detail in the Appendix. If it is unsound to build large numbers of houses it must be equally unsound to build individual allocations. In addition, The Elephants In The Room, which have already been referred to at Matters 1 and 2 are also engaged throughout Matter 3. See the Appendix.

Unnumbered: Individual Allocations

This is a duplication of matters that could be considered in individual sites discussions, and can best be addressed during specific site-related sessions. Therefore, the Question itself is redundant.

3.3: Felixstowe's transport networks

3.3(a): This cannot be properly answered without also considering the Trimley Villages, where the combined Housing Allocations are 4,028. Furthermore, this number is understated due to the underestimation of Windfalls.

3.3(b): SCLP12.2 *“seeks to ensure”* a number of things, but makes no mention of *“the impact of developments on the transport networks”*, apart from a non-specific reference to *“infrastructure improvements”*.

3.3(c): Paragraph 102 of the NPPF states: *“Transport issues should be considered from the earliest stages of plan-making ... so that the potential impacts ... on transport networks can be addressed ... environmental impacts can be identified, assessed and taken into account ... patterns of movements ... are integral to the design of schemes.”* SCLP12.2 is silent on all these matters.

3.3(d): Another 4,028 houses on the Peninsula will generate over 20,000 extra vehicle movements each weekday, travelling: (a) through Felixstowe (b) along the High Road (c) on other local Peninsular roads (d) on the A12, A14 and Orwell Bridge and (e) through the new Croft Lane Roundabout.

3.3(e): The Creeping Normality of the cumulative impact of extra traffic has not been assessed.

3.3(f): Local *“strategies”* are merely aspirational, and effective mitigation will only be achievable through government intervention. See also Point 12 of the Elephants In The Room: *“According to Paragraphs 2.15 and 2.16 of the Plan, growth will not be sustainable until significant improvements to the A12, A14 and Orwell Bridge and the Northern Ipswich bypass has been completed.”*

3.3(g) – Soundness: A strategy can only become sound when traffic problems are properly defined, quantified and addressed. This has not happened. In addition, The Elephants In The Room confirm the lack of need for houses in both Felixstowe and the Trimley Villages.

3.4: “Up to 2,000 dwellings” at Garden Neighbourhood

3.4(a): It is folly to destroy farmland for unneeded houses, whose contribution to the Peninsula will include: (a) spoilage of its character (b) traffic problems (c) possible overloading of the sewage system and (d) noise, light and air quality pollution.

3.4(b): No justification appears in SCLP12.3. Various ineffective aspirations are described in the Appendix.

3.4(c): “New vehicular access points” are proposed, without an impact assessment regarding at least 10,000 extra daily vehicle movements every week day.

3.4(d): Criteria a) of SCLP12.2 states: “Employment opportunities are maintained to support ... the Port of Felixstowe and a wider range of employment types.” Jobs will be lost at the Port, with a knock-on impact elsewhere. The claim that Port jobs will be maintained and supported is naïve!

3.4(e) – Soundness: There is no need for 2,000 houses. The Council have decided on a policy then worked backwards to invent spurious justifications. SCLP12.2 and SCLP12.3 are inherently unsound. This is another example of The Elephants In The Room.

3.5: Effective development and community integration

3.5(a): The answer is “Yes and No”!

1. “Yes”: Development will happen if developers finance developments, which is beyond the influence of the Council.
2. “No”: The Map on Page 199 of the Plan clearly shows that the Garden Neighbourhood is a housing estate on the northern perimeter of Felixstowe, separated from it by the A154. If “integration” also means “amalgamation”, “assimilation”, “blending”, “incorporation” or “unification” then this will not happen.

3.5(b) – Soundness: This development will never be integrated into Felixstowe town, meaning it is unsound.

3.6: Effective education provision

3.6(a): Criteria b) says 630 primary school spaces will be created. This is Circular Reasoning, which is defined in the Appendix

3.6(b) – Soundness: There is no need for school places without 2,000 houses, meaning unsoundness.

3.7: Effective vehicular access?

3.7(a): Vehicle volumes must be considered alongside vehicular access, meaning at least 10,000 extra traffic movements every weekday must be properly assessed.

3.7(b): SCLP12.3 minimises traffic problems by mentioning: “New vehicular access points off Candlet Road and/or improvements to existing access”. For access details see the Appendix.

3.7(c) – Soundness: Vehicular access cannot be sound until a traffic study has been commissioned.

3.11: Character and appearance

3.11(a): The answer is “No”! The site is rural and agricultural. The landscape will be destroyed with: (a) 2,000 houses, (b) at least 10,000 extra daily traffic movements (c) a traffic-congested Gulpher Road and (d) extra Candlet Road/A154 access and exit points.

3.11(b) – Soundness: The area's character and appearance can never be safeguarded, reinforcing the development's unsoundness, combined with The Elephants In The Room.

Matter 3: Various Policies Regarding Felixstowe – Ian Cowan Response

3.16: Port – Habitats Regulations

3.16(a): SCLP12.7: *“Employment proposals which are considered to be of a strategic scale and nature, or those which generate large movements of heavy goods vehicles will be directed to sites within the Employment Area.”* This contradicts the need for Innocence Farm as a strategic employment site.

3.16(b): Presumably, *“the site”* refers to Landguard Nature Reserve, which is: *“A designated Local Nature Reserve (LNR) due to its value to the local community and a Site of Special Scientific Interest (SSSI) because of its high wildlife conservation value, such as its rare vegetated shingle habitat and botanical species.”*

3.16(c): SCLP12.7: *“Applications for development will need to be subject to a Habitats Regulations Assessment screening. Any development that would result in significant adverse effects on protected landscapes ... will not be permitted”.*

3.16(d) – Soundness: A SSSI is protected by law and Matter 3 is answered by reference to SCLP12.7.

Matter 3: Innocence Farm – Ian Cowan Response

3.47: Innocence Farm

3.47(a): Inconsistencies: There are two glaring Inconsistencies, set out in the Appendix -

1. It is not an NPPF requirement with no place in the Plan.
2. It is in a rural area, deserving special protection.

The obvious first Question is: ***“Why is Innocence Farm in the Plan?”***

3.47(b): Innocence Farm is a Project involving several major elements, which should be considered together.

3.47(c): The Plan is sparse regarding details and implications. Based on personal research, my conclusions are damning with regards to need, soundness and deliverability.

3.47(d): The Council is promoting this Project despite various obvious fatal flaws. These are described in the Appendix. Their blind determination to proceed despite the contrary evidence calls their judgement into question!

3.47(e): The following must be determined: *“Is there spare Port capacity to support Innocence Farm operations?”*.

3.47(f): The Port will only be able to supply 22% of the Project's daily container needs. My calculation appears in the Appendix.

3.47(g) – Soundness: If the Port cannot handle the 3,200 daily containers the Project is not physically or financially viable and is unsound and undeliverable!

3.48: Developability

3.48(a): The Project requires: (a) a railhead (b) a bridge over the Levington Link Road and A14 and (c) a roundabout at Croft Lane. This roundabout will bear: (a) the same traffic as the Dock Spur Roundabout plus (b) extra Innocence Farm vehicles plus (c) extra vehicles from thousands of new houses.

3.48(b): There is no requirement in the Plan for railhead bunding. Plus: (a) the single track line will need to be doubled and (b) the A14 and Levington Link Road will need to be closed or diverted when the roundabout and bridge are being constructed.

3.48(c): The combined costs will be astronomical, and not borne by government, the Port, or landowners. Finance must come from Innocence Farm users. They will balance: (a) the benefits of a costly location close to the Port against (b) the lower costs of locations further away not requiring the financing of (i) railhead (ii) bridge (iii) roundabout (iv) bunding (v) extra railway line and (vi) closure or diversion of the A14/Levington Link Road. The risks do not justify the rewards, meaning the Project will never be delivered.

3.48(d) – Soundness: The site is unsound and undeliverable because: (a) the Plan fails to describe the extent of the Project and (b) its huge cost means it is not financially viable.

3.49: A14

3.49(a): Access is via a roundabout at Croft Lane. However, there is no traffic assessment. If 3,200 full containers enter the site via the railhead/bridge, 3,200 full container-carrying lorries will exit via

the roundabout. Plus: (a) 600 other vehicles will also need access and (b) around 3,200 lorries, presumably hauling empty containers, will enter the site via the new roundabout.

3.49(b): Paragraph 12.349 of the Plan gives a contradictory message regarding traffic. The “flexible approach” to “ever changing demands” means the number of vehicles will be in excess of 3,200 and 600, because they will not be limited to containers arriving through the Port.

3.49(c): Around 4,200 lorries currently travel to/from the Port daily. My calculation appears in the Appendix.

3.49(d): When Innocence Farm is up and running lorry traffic on the A14 will increase by 90%. (3,200 + 600 / 4,200 x %) It will be even higher still with a “flexible approach” to “ever changing demands”. This does not take into account the thousands of extra vehicle movements generated by new housing! The Peninsular A14 could require improvements similar to the Cambridge to Huntingdon Improvement Scheme, costing £1.5 billion!

3.49(e) – Soundness: The Plan ignores the impact of extra traffic on the Croft Lane roundabout and A14. A doubling of traffic volumes makes the Project unsound. Plus, the matters discussed above mean the Project is already unsound and undeliverable! A proper traffic study would confirm my calculations.

3.50: Rail connection/ Railhead justification

3.50(a): The Plan is silent regarding these matters, and stakeholders have to revert to simple arithmetic.

3.50(b): The railhead's infrastructure requirements can be assessed by comparing similar operations at the Port. These can be seen in the Appendix.

3.50(c): The railhead will need at least 20 sidings and 9 gantry cranes, plus space for: (a) lorry transit and parking (b) container storage (c) on and off ramps for the bridge (d) in and out lanes to the roundabout and (e) bunding.

3.50(d): I estimate the railhead measures approximately 800 by 100 metres. The facilities required cannot be accommodated in such a small area. It is interesting that there is no bunding requirement in the Plan. Its addition would leave no room for anything else!

3.50(e): At least 60 extra trains will run to and from the railhead. My calculation is in the Appendix.

3.50(f): Since the 62 existing trains can only run efficiently with the 1.4 mile passing loop, at least another 60 trains per day will require a doubling of the railway line, and perhaps another passing loop.

3.50(g) – Soundness: Common sense confirms that the railhead is a practical impossibility, and unsound.

3.51: Air Quality, etc

3.51(a): Air quality, light, noise, traffic, landscape and visual assessments are essential, as well as the criteria noted at a) to e) of SCLP12.35. Given the Project's life-threatening pollution, it is irresponsible that these assessments are not a Plan requirement!

3.51(b): According to the European Environment Agency, 52,430 premature deaths occurred in the UK in 2012 as a result of increased mortality from stroke, heart disease, chronic obstructive pulmonary disease, lung cancer and acute respiratory infections because of pollution. See the

Appendix for details. Noxious pollution from the Project will add to these deaths!

3.51(c): The Project destroys 116 hectares of farmland at Innocence Farm plus an unspecified area at the railhead. It will be an intrusive and polluting blot on the pastoral landscape, which can never be mitigated, especially with 24/7 operations producing: (a) constant noise (b) noxious air quality pollution and (c) intrusive light pollution. These will have adverse health and wellbeing impacts on: (a) the residents of neighbouring communities (b) users of the road network (c) Project employees and (d) pupils, teachers and parents at Trimley St Martin Primary School.

3.51(d) – Soundness: The Project needs honest assessments of all matters referred to above. Policy SCLP12.35 states: *“Any development which would result in significant adverse effects which would not be appropriately mitigated will not be permitted.”* The *“adverse impacts”* of the Project can never be *“appropriately mitigated”*. Therefore, a Planning Committee is bound to reject a Project being promoted in the Council's own Plan! The Project is fatally flawed and chronically unsound, meriting repetition of the Question: ***“Why is Innocence Farm in the Plan?”***.

SCDC Local Plan Inquiry: Response By: Ian Cowan

Matter 3: Issue 3 – Rural Areas Including Trimley St Martin

Issue 3 – Rural Areas: Trimley St Martin is a “*Rural Area*”. Therefore, housing requirements should be limited to those relevant to a “*rural area*” and not the many hundreds already allocated and proposed in the Plan. NPPF references to “*rural areas*” are summarised in the Appendix.

Issue 3 - Overall Soundness: None of the Trimley St Martin allocations: (a) are “*responsive to local [village] circumstances*” (b) “*reflect local [village] needs*” (c) or “*maintain the vitality of rural communities*”. They will turn it into a Felixstowe suburb. Over-development of a village whose population is only 2,033 is at odds with it being a “*rural area*”. Therefore, all proposed housing allocations are unsound.

3.90: Howlett Way site allocation

3.90(a): The phrase “*Howlett Way*”: (a) is mentioned 10 times in the FPAAP (b) is described in detail from page 40 and (c) is Policy FPP7.

3.90(b) – Soundness: What is the point of this Question?

3.92: Reeve Lodge boundary

3.92(a): SCLP12.66: “*8.59 ha of land adjacent to Reeve Lodge, High Road, Trimley St Martin, is identified for the development of approximately 150 dwellings.*” The map in the Plan, clearly defines -

1. Blue – “*Mixed Use Allocation*”.
2. Yellow – “*Housing Allocation*”.
3. Red – “*Housing Permissions at 31/3/18*”.
4. Red Line – “*SCLP3.3 Settlement Boundaries*”.

3.92(b): - Soundness: What is the point of this Question?

3.93: Dwellings / older population needs

3.93(a): Criterion a): “*A mix of housing ... including housing for older people and the provision of self-build plots.*” The phrase “*older people*” occurs 26 times in the Plan, without defining how their needs will be met. However, their possible means of provision are described at Paragraph 5.44.

3.93(b): The aspiration to provide older people's housing is sufficient for Plan purposes. Specific site requirements will only be necessary with actual Planning Applications.

3.93(c): There appears to be some inconsistency regarding this Question, as described in the Appendix.

3.93(d) – Soundness: Unless there is consistency and the same Question is asked for all housing allocations, it could be said that there is a lack of soundness in the Questioning!

3.94: Future school expansion

3.94(a): This Question pre-supposes that Trimley St Martin Primary School will be closed.

3.94(b) – Soundness: Such a need will only arise if the Innocence Farm Project is found to be sound.

3.95: Kirton Water Recycling Centre

3.95(a): Treatment limitations are discussed in the “Cross Boundary Water Supply Study” prepared for SCDC and Ipswich BC by Wood Environmental & Infrastructure Solutions UK Ltd in January 2019. Paragraph 3.44: “ *In response to specific housing and employment site queries from SCDC, Anglian Water have indicated that enhanced treatment capacity will be required at Framlingham and Kirton WRCs, and may also be required at Yoxford WRC.*”

3.95(b): Table 5.2a of this Study reaches detailed conclusions for all sites. Reeve Lodge is discussed at Page 100. The relevant comments are summarised in the Appendix.

3.95(c): The Reeve Lodge wording is repeated throughout Table 5.2a and indicates no constraints to development. I have searched for the phrases “*advanced treatment*” without success. “*Treatment capacity*” appears only once as a Footnote on Page 57. Therefore, the relevance of “*stated treatment limitations*” to “*deliverability or developability*” is difficult to understand.

3.95(d): If there really are “*treatment limitations*”, they should apply to every current and proposed site serviced by the Kirton Water Recycling Centre. However, references to this facility appear only twice in the Inspector's Questions, with reference to Bucklesham Road, Kirton and Reeve Lodge.

3.95(e) – Soundness: Unless there is consistency, there is a lack of soundness in the Questioning!

3.96: Pedestrian / cycle links

3.96(a): This Question is of little importance. An “effectiveness” Question could be asked with equal relevance about self-build plots, early years provision, open spaces, landscaping and boundary treatments. Surely, such matters are best discussed in the event of specific Planning Applications.

3.97: Habitats Assessment screening

3.97(a): Paragraph 3.55: “*Where a project involves multiple consents, developers will be expected to work collaboratively with authorities to prepare a project wide Habitats Regulations Assessment*”. This is reaffirmed in SCLP3.4. The phrase “*Habitats Assessment*” can be found 41 times in the Plan, including generically in “*Infrastructure*”, “*Tourism*” and “*Flood Risk*” as well as with reference to specific allocations elsewhere.

3.97(b) – Soundness: Although SCLP12.65 does not specifically mention “*Habitats Regulations Assessment*” with regards to Reeve Lodge, this may be an inadvertent error, amply covered elsewhere. Therefore, what is the point of this Question?

Howlett Way / Reeve Lodge Soundness: There is no need for housing allocations at these locations because of the Elephants In The Room.

Matter 3 – Appendix – Ian Cowan

The Elephants In The Room -

1. FOIA correspondence confirms there is no evidence that sufficient numbers of jobs have already been created to support the Plan's aspirations.
2. If any jobs are created, they will “*predominantly*” arise in employment categories that will not provide sufficient numbers to come anywhere near the total aspiration, nor will many of these employees be able to afford “*market value*” homes.
3. These jobs are identified at Paragraph 3.17 in the Plan as being: “*service, tourism, business and professional services*”.
4. Jobs will not arise at the three major employers, namely the Port of Felixstowe, BT/Adastral and Sizewell.
5. In addition, their description as “*key economic drivers*” is meaningless with regards to future economic impact.
6. The jobs figure is gross, and takes no account of future jobs losses. If jobs numbers have been calculated elsewhere on the same basis, they have also failed to take account of losses.
7. Specifically, jobs will be lost at the Port and BT/Adastral.
8. Businesses continually strive for economies of scale, including rationalisation and redundancies, a prime example being the amalgamation of SCDC and Waveney.
9. No account has been taken of jobs losses through the implementation of robotics and artificial intelligence. The Heatmap on Page 15 of my Consultation response indicates that considerable numbers of jobs could be lost.
10. Specific market signals include the lack of progress at the 2,000 homes housing development at Brightwell Lakes and the abandonment of the Uniserve Super Distribution Centre at the Port.
11. Micro/Small/Medium Businesses will have an insignificant impact on jobs growth.
12. According to Paragraphs 2.15 and 2.16 of the Plan, growth will not be sustainable until there are significant improvements to the A12, A14 and Orwell Bridge and the Northern Ipswich bypass has been completed.

Unnumbered: Justification of housing numbers -

1. Needs: There is no need to build large numbers of houses anywhere for the simple reason that large numbers of jobs will not be created.
2. Windfalls: Housing allocations cannot be considered in isolation, but in conjunction with large numbers of uncontrolled Windfalls.
3. Creeping Normality: The cumulative impact of numerous allocations and uncontrolled Windfalls will have a severe impact on all infrastructure elements. In other words: “*The way a major change can be accepted as a normal situation if it happens slowly, through unnoticeable increments of change. The change could otherwise be regarded as objectionable if it took place in a single step or short period.*”

3.4(b): Aspirational insults to the intelligence -

1. A “*leisure led development*” is nonsense. This is a housing-led development where two existing leisure centres will be closed for no good reason
2. A “*dementia friendly environment*” is a concept that does not appear in the NPPF.
3. In reality, “*Community engagement*” means ignoring the will of the community.
4. “*Appropriate green infrastructure provision*” means the destruction of 143 hectares of farmland.
5. Public rights of way will never be “*enhanced*” by surrounding them with houses, nor will artificially created “*Bodiversity networks and habitats*”.

3.6(a): Circular Reasoning: *“A logical fallacy in which the reasoner begins with what they are trying to end with. The components of a circular argument are often logically valid because if the premises are true, the conclusion must be true.”* There would be no need for school spaces if there were no houses!”

3.7(b): Current North Felixstowe access points -

1. Currently access is via Gulpher Road, which may not cope with substantial extra traffic movements.
2. Candlet Road/A154, is the main route between the Port and the A14.
3. There are no access points between Candlet Road and Gulpher Road.

3.47(a): Policy SCLP12.35 – Disturbing Inconsistencies:

1. NPPF Anomaly: A Local Plan forward plans for infrastructure, homes and jobs for the long-term benefit of the environment, businesses and residents. Innocence Farm is an anomaly, because it is neither a requirement of the NPPF nor does it contribute to jobs creation or housing needs. Modern warehousing robotics means that few humans are required. Therefore, the environmental destruction and pollution outweigh any benefits. This is an intrusive and destructive Project that profits the landowners, Trinity College, Cambridge and their agents, Bidwells LLP without benefits to the community. It is disturbing that the Council is promoting this anomalous Project.
2. Rural Area Anomaly: The Inspector includes Innocence Farm within his “Rural” Matters, which presumably means that this location complies with the NPPF definition of a Designated Rural Area: *“National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985.”* The NPPF makes numerous references to “rural” areas, none of which allow for developments of the scale of the Innocence Farm Project, including -
 - Paragraph 84: *“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).”*
 - Paragraph 103: *“However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*
 - Paragraph 117: *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”*
 - Paragraph 118b: *“Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production”.*

3.47(d): Fatal flaws in Innocence Farm Project -

1. The Council's own consultants have rejected it.
2. They have suggested a more suitable alternative.
3. It is not supported by the Port.
4. It does not need to be located east of the Orwell Bridge.
5. There is no need for facilities operated by different businesses to be clustered together.
6. The required infrastructure makes it too costly to be financially worthwhile.
7. Shunting trains for a distance of only 10 miles is grossly uneconomic.

3.47(f): The Port cannot support Innocence Farm's daily container needs -

1. According to Andrew Blackwell of Bidwells, daily throughput at Innocence Farm will eventually be 3,200 containers operating 24/7. Presumably, these are 40 foot containers.
2. These will be in addition to containers already passing through the Port, because it currently operates without the need for this facility.
3. If these are 40 foot containers this equals 6,400 Teu's. (3,200 x 2) For simplicity I will use 6,000 daily Teu's in my calculations, in order to include some 20 foot containers within the mix.
4. Allowing for down days, this equals 2,160,000 Teu's per annum. (6,000 x 360).
5. According to a graph in the "Port of Felixstowe Growth and Development Needs Study Final Report" published by Royal HaskoningDHV in July 2018, Port throughput is no greater than 4,000,000 Teu's per annum. (My Response Page 18).
6. This Study states that the Port is operating at 81.63% capacity. (Page 19) For simplicity, I will use 82%.
7. It is impossible to operate at 100% capacity. However, being generous regarding their logistics skills I will assume that the Port can achieve a capacity increase of 15%, giving 98% capacity.
8. This means that the Port might manage an annual throughput increase of 732,000 Teu's. (4,000,000 / 82 x 15)
9. However, 10% of containers are currently trans-shipped and 25% travel onwards by rail. I assume that extra throughput will be similarly distributed.
10. Only 476,000 Teu's (732,000 x 65%) will be available for annual transfer to Innocence Farm.
11. The Port will only be able to feed an extra 1,300 Teu's per day, (476,000 / 52 / 7) to Innocence Farm, which is only 22% of the Project's projected containers input. (476,000 / 2,160,000 x % or 1,300 / 6,000 x %)
12. If the Port can only feed the Project with 22% of its requirements it is economically unviable.

3.49(b): Paragraph 12.349's contradictory message: *"Uses on this site will be restricted to those which provide support for port related businesses and operations. The Council will take a flexible approach to these uses to allow businesses to be flexible and respond to ever changing demands of the sector."*

3.49(c): Calculation of Daily Port traffic -

1. Annual throughput is taken to be 4,000,000 Teu's.
2. For simplicity, I assume this equals 2,000,000 x 40 foot containers.
3. Since 10% are transshipped and 25% travel by rail, this means that 1,300,000 containers currently travel by road every year. (2,000,000 x 65%)
4. This equals around 4,200 lorries per day travelling along the A14 in each direction. (1,300,000 / 52 / 6)

3.50(b): The Railhead's infrastructure requirements -

1. There are three rail Terminals at the Port.
2. They operate on 20 tracks, or sidings.
3. Their total annual capacity is 1.36 million Teu's.
4. Between them, 62 daily services run between 16 destinations
5. Nine gantry cranes are required for container loading and unloading.

3.50(e): Trains per day to Innocence Farm railhead -

Trains rarely run at full capacity. Using statistics at 3.50(b), the average train leaving the Port hauls 70 Teu's of containers. (1,360,000 / 62 / 52 / 6) I have assumed that trains to the railhead will be more efficient, hauling a generous 100 Teu's each. If 3,200 containers travelling by rail from the Port is equivalent to 6,000 Teu's, this means 60 trains per day (6,000 / 100), over and above the 62 which currently run. If the figure was only 70 Teu's, this would mean 86 extra trains per day.

3.51(b): Sources of noxious pollution -

- | | |
|------------------------------------|-------------------------|
| 1. Fine particulate matter (PM2.5) | 37,800 annual UK deaths |
| 2. Ozone (O3) | 530 annual UK deaths |
| 3. Nitrogen dioxide (NO2) | 14,100 annual UK deaths |

Matter 3 Issue 3: Rural areas according to the NPPF -

1. Paragraph 77: *"In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs."*
2. Paragraph 78: *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."*

3.95(b): The relevant Water Study comments are summarised below -

1. *"Water Resource Availability - AWS have accounted for the scale of growth proposed in the local plans and presented a WRMP that demonstrates that a supply demand balance is maintained without constraining development."*
2. *"Wastewater Treatment and Water Quality - No deterioration in WFD classes predicted. Further assessment will be required within the lifetime of the plan."*
3. *"Flood Risk and Drainage - A site-specific flood risk assessment will be required for this site. It is likely that infiltration SuDS are viable at this site, further investigation and details of which should be included in the drainage strategy."*

3.93(c): Inconsistencies regarding this Question -

1. Similar Questions are asked regarding small sites at Eyke Primary School, Chapel Road, Grundisburgh, Pettistree and Westleton. The Plan mentions the need for *"older population"* housing at these sites.
2. However, similar Questions are not asked for Brackenbury Sports Centre, South Saxmundham Garden Neighbourhood, Woodbridge Town Football Club and Swiss Farm Cottage, Otley. The Plan also mentions the need for *"older population"* housing.
3. No provision is made in the Plan for *"older population"* houses at Felixstowe Garden Neighbourhood, Brightwell Lakes and Howlett Way, Trimley St Martin, where the housing allocations are 2,000, 2,000 and 360 respectively. Surprisingly, a similar Question is not asked for these locations.