

Environmental Information Regulations – Response - 26579

Thank you for your response to my previous Environmental Information Regulations request (Ref. 26523), in which Suffolk County Council confirmed that no information is held regarding highways correspondence or assessments for Foxhall Road, Dobbs Lane, or the surrounding A12 corridor.

Since receiving that response, Suffolk County Council has publicly announced a £63 million package of A12 Major Road Network (MRN) improvements between the A12/A14 Seven Hills junction and Woods Lane, Woodbridge. Given the close geographical and functional relationship between this scheme and the proposed housing developments at Martlesham Heath, Foxhall Road, Dobbs Lane and Kesgrave, I would like to submit the following follow-up request under the Environmental Information Regulations 2004. Information requested

Please provide copies of all correspondence, reports, data, or modelling used to support Suffolk County Council's Major Road Network (MRN) improvement scheme for the A12 corridor between the A12/A14 Seven Hills Junction and Woods Lane Junction (Woodbridge), including but not limited to:

1. Traffic or transport modelling data underpinning the MRN business case, funding submission, or planning application particularly any datasets or forecasts that reference housing or population growth.

The A12 MRN Planning Application has been validated and registered.

Application Ref: SCC/0170/25SC

Proposal: Transport improvements to the A12 from Junction 58 (Seven Hills, Ipswich) to Woods Lane Roundabout, Woodbridge including the upgrade from a single carriageway to dual carriageway between A12 / B1438 and the A12 / B1078, Construction and operation of a Mobility Hub and Associated Infrastructure, Construction of a new pedestrian bridge and other highways and pedestrian improvements.

Location: A12 between Junctions 58 (Seven Hills) and Woods Lane Roundabout, Woodbridge, Suffolk.

The planning application documents has been validated and published online here:

<https://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0170%2F25SC>

This includes “traffic or transport modelling data” within the Transport Assessment and appendices.

Within section 12.4 of the Transport Assessment are details of the developments that have been included in the modelling (parts 1 & 3 of EIR 26579).

Two additional documents are included:

- Pre-Application Comments

- Minutes of a meeting to discuss the transport scope as part of an Environmental Impact Assessment

2. Correspondence, meeting notes or technical discussions between Suffolk County Council, East Suffolk Council, National Highways, Department for Transport, or any developers or consultants concerning:

- *Housing allocations or proposals at Martlesham Heath, Foxhall Road, Dobbs Lane, Kesgrave or Bridge Farm/Top Street;*
- *Anticipated traffic impact of housing developments exceeding 500 dwellings; and*
- *Mitigation or junction improvements linked to those sites.*

All responses from Suffolk County Council (and National Highways too) to planning consultation on sites in this area would be held by East Suffolk Council on their planning portal, see below link:

[View and comment on a planning application » East Suffolk Council](#)

*It should be noted that, during the timeframe of this request (2018 to date), pre-application advice was sought from SCC regarding proposed housing developments at some of the sites in question. As this is a paid-for service and the advice provided is confidential and commercially sensitive, it is being withheld from this FOI. Please see full exemption explanation at the end of this response.

3. Documents, maps, or studies that model or assume traffic generation from strategic housing sites identified in the East Suffolk Local Plan or SHELAA (Site 453 and Site 520) when preparing or updating the A12 improvement proposals.

Also under part 3 of EIR 26579, the Transport Evidence Base that was formed for the former Suffolk Coastal District Council (now East Suffolk Council) Local Plan is available on East Suffolk's Website: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/>. However, this evidence has been updated since the publication in 2018 and 2019. The most recent modelling report (October 2020) for Ipswich Area is available through Babergh/Mid Suffolk's Website: <https://www.midsuffolk.gov.uk/w/current-evidence>

4. Any consultant contracts or technical briefs commissioned by or for Suffolk County Council which include assessment of housing growth, cumulative impact, or A12 corridor capacity.

All information relating to the A12 Corridor scheme is available to view on the link provided above.

Please include all material created or received between 1 January 2018 and the present date, regardless of format (emails, attachments, spreadsheets, meeting notes, consultant reports, or business-case appendices).

Exemption of Pre-Application Advice:

Suffolk County Council can confirm that they hold this information; however, we are withholding it under r. 12(5)(d) Confidentiality of Proceedings, r.12(5)(e) Confidentiality of Commercial or industrial information and r.12(5)(f) interests of the person who provided the information to the public authority of the Environmental Information Regulations 2004 (EIR).

Regulation 12(5)(d)

Regulation 12(5)(d) of the EIR allows a public authority to refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of the proceedings of that, or any other, public authority, where such confidentiality is provided by law.

To engage this exemption 3 conditions must be met.

Condition one: the confidentiality in question must specifically relate to the confidentiality of proceedings. Suffolk County Council (SCC) offers a paid for, pre-planning application advice service where officers will provide an impartial assessment of proposals and indicate any potential policy conflicts or shortcomings within the application, including where further information may be needed.

In previous decision notices, including IC-292887-Z7J4, the Commissioner has acknowledged that such processes represent a 'proceeding' for the purposes of r.12(5)(d).

Condition two: the confidentiality must be provided by law. SCC believes that the information meets the threshold for the common law of confidentiality as the information is not trivial and was submitted by the applicant as part of the pre-application advice process and deemed by them to be confidential. Pre-application advice is not a statutory function; it is a voluntary process designed to assist developers with identifying and addressing any potential issues early on, prior to submitting a planning application for formal consideration. Planning applications and their supporting documents are made available to the public but pre-application advice does not form part of this process or outcome. It is up to the applicant whether they take the advice provided and it is regarded as confidential by both SCC and the planning applicants.

Condition Three: it must be demonstrated that disclosure would have an adverse effect on the confidentiality of the proceedings in question. Planning applicants who request pre-planning advice have an expectation when they enter the process that it is confidential. If SCC then discloses this information to the world at large, there would likely be significant damage to the relationship the applicants have with SCC, along with future relationships with that applicant or others.

Whilst in this situation a planning application has now been submitted, releasing the pre-planning advice provided and setting a precedent for doing so, simply because an application has been made, would significantly impact the current and any future applicants' trust in SCC and, therefore, their willingness to engage with the pre-application process. If applicants do not feel that they can trust SCC, this would significantly undermine the process of providing a confidential pre-application opinion and undermine their ability to have full and frank discussions regarding the planning proposals at hand. Another purpose of the pre-application process is to avoid SCC spending time and resources on considering inappropriate and non-compliant planning applications. Whilst there is no guarantee a subsequent application will be approved, it assists applicants and the Council by potentially improving the quality of applications.

Even though SCC considers, through the three conditions being met, therefore, engaging r.12(5)(d), the public interest test must still be considered.

Public interest arguments in favour of disclosure:

- Facilitate openness and transparency in Suffolk County Council's affairs.
- Facilitate the accountability and transparency of Suffolk County Council's decisions.

Public interest arguments in favour of withholding:

- Providing a confidential setting for pre-application advice allows for comprehensive and frank discussions that may not take place if public. Keeping conversations confidential improves engagement.
- Applicants who do not engage with pre-application advice are more likely to have their planning applications rejected, costing Suffolk County Council more time and money.
- An applicant does not need to follow any pre-application advice provided when submitting any formal planning application. Nor is the decision-maker for any subsequent formal planning application bound by any pre-application advice.

Accordingly, we have determined that it is not in the interest of the Council to release the information. Therefore, this information is withheld under r.12(5)(d).

Regulation 12(5)(e)

Regulation 12(5)(e) allows a public authority to withhold information where its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.

In order to engage this exemption, the following questions must be considered:

1. Is the information commercial or industrial in nature?

The request relates to pre-planning advice for a development in Suffolk and, therefore, is classed as commercial information.

2. Is the information subject to confidentiality provided by law?

SCC believes that the information meets the threshold for the common law of confidentiality as the information is not trivial and was submitted by the applicant as part of the pre-application advice process and deemed by them to be confidential. Pre-application advice is not a statutory function and is a voluntary process designed to assist developers with identifying and addressing any potential issues early on prior to submitting a planning application for formal consideration. Planning applications and their supporting documents are made available to the public but pre-application advice does not form part of this process or outcome. It is up to the applicant whether they take the advice provided and is regarded as confidential by both SCC and the planning applicants.

3. Is the confidentiality provided to protect a legitimate economic interest?

Disclosure of pre-planning advice into the public domain would provide other individuals with a strategic advantage. Individuals or organisation could obtain strategic intelligence whilst maintaining their own confidentiality around any proposals they may have to develop the area. Consequently, this would mean that any planning applicants' economic interests would be adversely affected. Releasing the information alongside setting a precedent for releasing the information, would likely lead other organisations/individuals to submit requests for copies of pre-planning advice we have provided/been requested, to gain insights on any potential developments or proposed plans they could use before any planning application was published.

4. Would the confidentiality be adversely affected by disclosure?

Whilst in this situation a planning application has now been submitted, releasing the pre-planning advice provided and setting a precedent for doing so because an application has been made, would significantly impact the current and any future applicants trust in SCC and, therefore, their willingness to engage with the pre-application process. If applicants do not feel that they can trust SCC, this would significantly undermine the process of providing a confidential pre-application opinion and undermine their ability to have full and frank discussions regarding the planning proposals at hand. Another purpose of the pre-application process is to avoid SCC spending time and resources on considering inappropriate and non-compliant planning applications. Whilst there is no guarantee a subsequent application will be approved, it assists applicants and the council by potentially improving the quality of applications.

Even though SCC considers, through the four conditions having been met, therefore, engaging r.12(5)(e), the public interest test must still be considered.

Public interest arguments in favour of disclosure:

- Facilitate openness and transparency in Suffolk County Council's affairs.
- Facilitate the accountability and transparency of Suffolk County Council's decisions.

Public interest arguments in favour of withholding:

- Pre-planning advice is not the same as a planning application. Planning application information is released into the public domain once an application has been made releasing relevant information into the public domain at that stage.
- Releasing pre-planning advice, which has been provided in confidence, into the public domain would likely result in individuals and developers being discouraged from taking up pre-planning advice, which is not mandatory, for fear their information would be released into the public domain. This would likely result in more work for SCC through more refusals as issues would not have been able to be discussed at the earliest opportunity before any proposals had been presented.
- Releasing pre-application planning advice would harm SCC's ability to carry out the process effectively. The applicants would no longer trust SCC with their confidential information and either not engage with the process or withhold vital information over concerns it would be made public.
- Providing a confidential setting for pre-application advice allows for comprehensive and frank discussions that may not take place if public. Keeping conversations confidential improves engagement.
- Applicants who do not engage with pre-application advice are more likely to have their planning applications rejected, costing Suffolk County Council more time and money.
- An applicant does not need to follow any pre-application advice provided when submitting any formal planning application. Nor is the decision maker for any subsequent formal planning application bound by any pre-application advice.

Accordingly, we have determined that it is not in the interest of the Council to release the information. Therefore, this information is withheld under r.12(5)(e).

Regulation 12(5)(f)

Regulation 12(5)(f) allows a public authority to withhold information where disclosing it would adversely affect:

“(f) the interests of the person who provided the information where that person –

- (i) Was not under, and could not have been put under, any legal obligation to supply it to that or any other public authority;*
- (ii) Did not supply it in circumstances such that that or any other public authority is entitled apart from these Regulations to disclose it; and*
- (iii) Has not consented to its disclosure.”*

In order to engage this exemption, a four-stage test must be considered:

Stage one – was the person under, or could they have been put under, any legal obligation to supply the information to the public authority?

SCC can confirm that the applicant was not under any legal obligation to supply the information. Pre-planning advice is not mandatory.

Stage two – Did the person supply the information in circumstances where the recipient public authority, or any other public authority, was entitled to disclose it other than under the EIR?

The information was provided as a request for pre-planning advice and not as part of a formal planning application. The pre-application process is designed to provide applicants with impartial advice regarding their proposed scheme and where improvements or changes may need to be made should they decide to submit a formal planning application, details of which would then be placed into the public domain.

Stage three – has the person supplying the information consented to its disclosure?

The information was provided to SCC with the expectation that it would remain confidential and not be published in the public domain, the applicant has not consented to its disclosure. The pre-planning advice service is not mandatory nor is it a formal planning application where the information would be made publicly available.

Stage four – would disclosure adversely affect the interests of the person who provided the information to the public authority?

Whilst a planning application has been submitted in this case (and all information in relation to it has been made publicly available), setting a precedent to release non-mandatory pre-planning advice would lead to harm for future applicants as it would highlight how potential developers could access information disclosed in confidence to SCC, to allow them to adapt their own strategies or provide them with insights on other organisations' considerations, which would be detrimental to the interests of the developer. Releasing information of speculative proposals would lead to enquiries/objections about hypothetical scenarios and may also generate wider misinterpretation and confusion. Whilst some of the advice will have been generated by SCC, it is inextricably linked to and reveals the content of the information that has been provided in confidence by the applicant.

Even though SCC considers through the four conditions have been met therefore engaging r.12(5)(f) the public interest test must still be considered.

Public interest arguments in favour of disclosure:

- Facilitate openness and transparency in Suffolk County Council's affairs.
- Facilitate the accountability and transparency of Suffolk County Council's decisions.

Public interest arguments in favour of withholding:

- The information relates to pre-planning advice and confidential information that the applicant was not required to disclose to SCC; it does not represent a full planning application. Releasing information that has not formed or been included in a formal planning application, would likely lead to hypothetical questions being asked on information that is not relevant. All information in line with the planning application has been published in the public domain.
- The pre-planning advice includes commercially sensitive information that the applicant was under no obligation to provide. Pre-application advice would only be available through an EIR request and is not published online. Disclosing this information and setting a precedent for this type of information to be released into the public domain would provide competitors with a way to access other applicants' strategies and plans, with the view to undermine/undercut them with their own. This would also result in less applicants being willing to use the pre-planning application process or not sharing all relevant information for the best advice due to concerns about it being released into the public domain. This would result in more work for SCC staff at more expense due to issues in planning applications that could have been avoided if the process had been engaged.
- Any and all planning applications are subject to full public consultation. The pre-planning advice does not form part of a planning application; it is assistance in identifying potential problems before a planning application is lodged. All relevant information in relation to a planning application is made public for anyone to review.

Accordingly, we have determined that it is not in the interest of the Council to release the information. Therefore, this information is withheld under r.12(5)(f).

Redacted Information

All information released in response to a Freedom of Information Act 2000 (FOIA) or Environmental Information Regulation 2004 (EIR) request is deemed to be in the public domain. As such we must consider whether or not the requested information qualifies as personal information and should therefore not be released into the public domain.

The council has determined that this is personal information and is therefore exempt from disclosure under **section 40** of the FOIA and **regulation 13** of the EIR.

The Council considered the following, including the possible consequences of disclosure for the data subjects concerned and their reasonable expectations as to the use of their data:

- expectations of the individuals concerned about personal information being put into the public domain;
- reasonable expectations - the data subjects concerned would have a legitimate expectation of privacy concerning their personal information and would not have anticipated this being put into the public domain;

- whether or not the requested information could be anonymised; and
- balancing the individual's rights and the legitimate interests - In past cases the Information Commissioner has weighed the individual's rights to privacy against the public interest in disclosure. There is no presumption in favour of releasing personal data.

This is an absolute exemption, which means that if the condition is satisfied there is no additional public interest test to consider.

In assessing fairness, the Council considered the likely consequences of disclosure of the requested information. Personal information should not be used in ways that have unjustified adverse effects on the individuals concerned. The council also considered whether such disclosure would be within the reasonable expectations of the individuals, given that any response to a request under the FOIA or EIR is deemed to be in the public domain. The council believes that in this instance it is not fair to disclose personal data and is therefore withholding the requested information under section 40 of the FOIA and regulation 13 of the EIR.

MEETING ACTIONS

| | | | |
|------------------------|---|---------------------|---------------|
| PROJECT NUMBER | 70091342 | MEETING DATE | 01 March 2023 |
| PROJECT NAME | A12 MRN Detailed Design & FBC | VENUE | MS Teams |
| CLIENT | Suffolk County Council | RECORDED BY | ■ |
| MEETING SUBJECT | A12 MRN Environmental Impact Assessment – Transport Scope | | |

| | |
|------------------------|---|
| PRESENT | <p>■ – SCC</p> <p>■ – SCC</p> <p>■ – SCC</p> <p>■ – SCC</p> <p>■ - ESC</p> <p>■ - WSP</p> |
| APOLOGIES | none |
| DISTRIBUTION | As above plus: ■ – WSP; ■ - WSP |
| CONFIDENTIALITY | Confidential |

| ITEM | SUBJECT | ACTION | DUE |
|------|---|--------|-----|
| 1. | <p>Introductions / Context:</p> <p>■ outlined context of the meeting was to discuss transport modelling which is a key element to inform elements of the EIA including Air Quality, Noise/Vibration, Greenhouse Gases and the Transport Assessment</p> <p>■ emphasised that meeting was discussion on transport elements and therefore did not necessarily imply any agreement on the approach to take for other elements of the EIA which environmental specialists would be responsible for.</p> | | |
| 2. | <p>Transport Models</p> <p>■ outlined there is a strategic transport model (SCTM) which previously informed an Outline Business Case for the scheme submitted to DfT, this has a pre-COVID baseline, reliant on data collected between 2016 and 2019.</p> | | |

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| | <p>Also there are VISSIM micro-simulation models of the A12 corridor between A12 / A1152 to south of A12 / Barrack Square.</p> <p>█ pointed out the transport models are peak hour models which have to be factored up to represent 24 hour flows.</p> | | |
| 3. | <p>A12 MRN Scheme</p> <p>█ queried whether dualling to the west of Woodbridge would still be included as part of the scheme. █ confirmed this is still part of the A12 MRN scheme.</p> <p>█ outlined the basis of comparison between Without A12 MRN Scheme (Do Minimum) and With A12 MRN Scheme (Do Something), which includes the consented Brightwell Lakes mitigation schemes in the Do Minimum.</p> <p>█ outlined distinction previously placed on length of pedestrian timings at the new Brightwell Lakes access in the With A12 MRN scenario, these timings were shortened in light of the Martlesham Bridge improvements. █ questioned this given current situation around bridge improvements. █ agreed that it may be advisable to have no distinction at this new signalised junction with and without the A12 MRN, therefore consented only scheme to be modelled going forwards.</p> <p>█ agreed with the premise overall that consented Brightwell Lake schemes should be included in the Do Minimum scenario. Brightwell Lakes has a major developer of Taylor Wimpey on board.</p> | | |
| 4. | <p>Seven Hills Interchange employment site</p> <p>█ raised there have been pre-app discussions in relation to a proposed employment site adjacent to Seven Hills interchange. There may be a Grampian condition for this site that if it comes forward then improvements to the A14 WB on-slip would have to be delivered first, therefore delivered in advance of the 600 dwellings required by Brightwell Lakes for an improvement at this junction.</p> <p>█ queried if there was any landowner issues related to this site. █ considered landowner issues to not be significant and they were amenable to the development coming forward.</p> <p>█ would like to arrange a meeting with SCC, ESC and National Highways to ensure alignment on Seven Hills Interchange situation.</p> | | |

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| <p>5.</p> | <p>Area of impact for scheme / Uncertainty Log</p> <p>■ outlined the area of impact for the scheme, consistent with what was presented at Outline Business Case (OBC). ■ feedback on this is that it should be extended out to ensure it covers Trimley / Trimley St Mary into Felixstowe.</p> <p>■ stated the Martlesham Police HQ development has had its planning application refused and is unlikely to come forward again.</p> <p>■ also flagged the need to ensure the Sizewell Freight Management Facility (FMF) is properly considered as well as the new proposed employment sites.</p> <p>■ to send across spreadsheet with Uncertainty Log for East Suffolk for ■ to review.</p> <p>■ flagged there is an Infrastructure Delivery Plan (IDP) for Felixstowe & Trimley across a 20 year timeframe therefore phasing and what is proposed to be delivered can be shared and what the key trigger points are.</p> <p>Ipswich Garden Suburb – need to be ensure all parts of the site are now in the Core Scenario, including Red House Farm & Ipswich School element of the site which now have more certainty to come forward.</p> <p>■ also flagged review of latest assumptions on Humber Douchy sites should be undertaken.</p> | <p>■ to issue OBC list of developments to ■ for review</p> | |
| <p>6.</p> | <p>Modelling scenarios</p> <p>■ outlined that modelled scenarios would be:</p> <ul style="list-style-type: none"> • Scheme opening year + Early Years Sizewell C construction traffic + Scottish Power Renewables (SPR) construction traffic • +15 years after opening + Operational Sizewell C <p>■ considered approach to scenarios is reasonable is A12 MRN is predicated on being in place before the Sizewell C Peak Construction period.</p> <p>■ flagged there is a legal challenge in relation to the SPR proposals which could mean this delay to when this comes forward.</p> <p>In summary, generally considered that on balance inclusion of Early Years Sizewell C construction traffic + SPR construction</p> | | |

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| | overlaid on scheme opening year is considered to be a robust assessment to be making. | | |
| 7. | <p>Ipswich Borough Council</p> <p>█ flagged that any air quality impacts within Ipswich (which has AQMAs) would be of interest to IBC, though given their location within Ipswich and nature of the A12 MRN scheme the impact is presumed to be likely to be minimal. █ is key contact at IBC.</p> | | |
| 8. | <p>General comments on assessment</p> <p>█ outlined that in reviewing impacts within the EIA, would seek to understand information on:</p> <ul style="list-style-type: none"> • Traffic which the scheme is inducing • Construction & traffic management associated with the A12 MRN scheme itself, and how this will interact with other traffic (including construction traffic on the network) at the same time <p>█ would want to see details of the transport scope, what the sensitivity thresholds are defined as being and the methodology for assessing these.</p> | WSP to outline transport scope for EIA to SCC | |

NEXT MEETING – NO FOLLOW-UP MEETING CURRENTLY PLANNED

Our Ref: SCC/0034/24SC/PreApp
Date: 14 May 2024
Enquiries to: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED]@suffolk.gov.uk



[REDACTED]
WSP UK Limited
Infrastructure Planning
70 Chancery Lane
London
WC2A 1AF

Dear [REDACTED],

Application No: SCC/0034/24SC/PreApp

Proposal: Pre-application advice for the A12 Major Road Network (MRN) Improvement Scheme (Seven Hills to Woods Lane).

Location: A12 Major Road Network Improvement Scheme, Seven Hills to Woods Lane.

Thank your pre-application enquiry. Suffolk County Council as County Planning Authority encourages pre-application discussions so that future expectations can be managed and to ensure the information provided in support of the planning application is adequate.

These comments are internal officer comments made without prejudice to the determination of any future planning application. They have been made on the basis of the following submitted information.

Technical Documents:

- A12 MRN Improvement Scheme Pre-Application Statement 70120294-WSP-HGN-XX-RP-CH-002 by WSP dated March 2024.

Plans & Drawings:

- General Arrangement Plan 70120294-WSP-LLO-XX-DR-CH-001
- Anson Road Sheet 1 70120294-WSP-LLO-AR-DR-CH-001
- Anson Road Sheet 2 70120294-WSP-LLO-AR-DR-CH-002
- Anson Road Sheet 3 70120294-WSP-LLO-AR-DR-CH-002
- Barrack Square 70120294-WSP-LLO-BS-DR-CH-001
- Dual Link Sheet 1 70120294-WSP-LLO-DL-DR-CH-001
- Dual Link Sheet 2 70120294-WSP-LLO-DL-DR-CH-002
- Dual Link Sheet 3 70120294-WSP-LLO-DL-DR-CH-003
- Dual Link Sheet 4 70120294-WSP-LLO-DL-DR-CH-004
- Grundisburgh Road 70120294-WSP-LLO-GR-DR-CH-001
- Main Road Portal Avenue Sheet 1 70120294-WSP-LLO-MR-DR-CH-001
- Main Road Portal Avenue Sheet 2 70120294-WSP-LLO-MR-DR-CH-002
- A14 Seven Hills Interchange 70120294-WSP-LLO-SH-DR-CH-001
- B1438 Roundabout 70120294-WSP-LLO-SR-DR-CH-001
- A1152 Woods Lane Roundabout 70120294-WSP-HGN-WL-DR-CH-001

Application documents required

Attention is drawn to [SCC's Planning Validation Checklist](#)

The content of the planning application will be agreed through the EIA Scoping Process.

Relevant Planning Policies

I particularly draw your attention to the following policies (but not limited to). These paragraphs and policies must be addressed in full within any forthcoming planning application:

National Planning Policy Framework December 2023 (NPPF)

- Paragraph 8 (a) an economic objective.
- Paragraph 8 (b) a social objective.
- Paragraph 8 (c) an environmental objective.
- Paragraph 11 presumption in favour of sustainable development.
- Paragraph 47 determining applications
- Paragraph 56 planning conditions and obligations
- Paragraph 85 building a strong, competitive economy.
- Paragraph 96 promoting healthy and safe communities.
- Paragraph 97 promoting healthy and safe communities.
- Paragraph 101 promoting healthy and safe communities.
- Paragraph 104 open space and recreation.
- Paragraph 108 promoting sustainable transport.
- Paragraph 109 promoting sustainable transport.
- Paragraph 114 considering development proposals.
- Paragraph 115 considering development proposals.
- Paragraph 116 considering development proposals.
- Paragraph 117 considering development proposals.
- Paragraph 131 achieving well designed and beautiful places.
- Paragraph 135 achieving well designed and beautiful places.
- Paragraph 136 achieving well designed and beautiful places.
- Paragraph 137 achieving well designed and beautiful places.
- Paragraph 138 achieving well designed and beautiful places.
- Paragraph 140 achieving well designed and beautiful places.
- Paragraph 157 meeting the challenge of climate change, flooding and coastal change.
- Paragraph 159 meeting the challenge of climate change, flooding and coastal change.
- Paragraph 162 meeting the challenge of climate change, flooding and coastal change.
- Paragraph 165 planning and flood risk.
- Paragraph 173 planning and flood risk.
- Paragraph 175 planning and flood risk.
- Paragraph 180 conserving and enhancing the natural environment.
- Paragraph 180 conserving and enhancing the natural environment.
- Paragraph 186 habitats and biodiversity.
- Paragraph 189 ground conditions and pollution.
- Paragraph 191 ground conditions and pollution.
- Paragraph 192 ground conditions and pollution.
- Paragraph 193 ground conditions and pollution.
- Paragraph 194 ground conditions and pollution.
- Paragraph 200 conserving and enhancing the historic environment.
- Paragraph 203 conserving and enhancing the historic environment.
- Paragraph 205 conserving and enhancing the historic environment.
- Paragraph 209 conserving and enhancing the historic environment.

East Suffolk (Suffolk Coastal) Local Plan September 2020

- Local Plan Vision for Suffolk Coastal 2018-2036.
- Policy SCLP 2.2 Strategic Infrastructure Priorities.
- Policy SCLP 3.1 Strategy for Growth.
- Policy SCLP 3.5 Infrastructure Provision.
- Policy SCLP 7.1 Sustainable Transport.
- Policy SCLP 7.2 Parking Proposals and Standards.
- Policy SCLP 9.2 Sustainable Construction.

- Policy SCLP 9.5 Flood Risk.
- Policy SCLP 9.6 Sustainable Drainage Systems.
- Policy SCLP 9.7 Holistic Water Management.
- Policy SCLP 10.1 Biodiversity and Geodiversity.
- Policy SCLP 10.3 Environmental Quality.
- Policy SCLP 10.4 Landscape Character.
- Policy SCLP 10.5 Settlement Coalescence.
- Policy SCLP 11.1 Design Quality.
- Policy SCLP 11.2 Residential Amenity.
- Policy SCLP 11.3 Historic Environment.
- Policy SCLP 11.4 Listed Building.
- Policy SCLP 11.6 Non-Designated Heritage Assets.
- Policy SCLP 11.7 Archaeology.
- Policy SCLP 12.20 Land at Felixstowe Road.
- Policy SCLP 12.25 Suffolk Police HQ, Portal Avenue, Martlesham.
- Policy SCLP 12.31 Strategy for Woodbridge.
- Policy SCLP 12.33 Land at Woodbridge Town Football Club.
- Policy SCLP 12.34 Strategy for the Rural Areas.
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Environmental Impact Assessment (EIA)

The County Council encourages the applicant to apply for an EIA Screening opinion, along with an EIA Scoping if required.

General comments on the proposed scheme

You will appreciate that the comments set out in this letter, are given on a without prejudice basis, and do not place any limitation on Suffolk County Council to come to a contrary view of the proposal, in the event, following submission of an application, that it considers that it is not acceptable or that information submitted with the application does not adequately demonstrate that the proposal is acceptable.

It is understood that the proposed scheme comprises of a series of improvements to the A12 between Seven Hills and Woods Lane, located to the east of Ipswich. The scheme includes:

- Improvements to seven junctions on the A12 from the A14 Seven Hills Junction in the south to Woods Lane, Woodbridge in the north.
- Improvements to minor road junctions adjacent to the above works.
- Dualling the single carriageway section of the A12 between the B1438 and the B1079.
- Construction of a mobility hub.
- A package of improvements for pedestrians and cyclists.
- A package of improvements for public transport.

The County Council (planning) support the scheme in principle and believes the proposed development does have the potential to be planning policy compliant. The scheme will be subject to a mandatory biodiversity net gain of at least 10%.

It is viewed that the most appropriate mechanism for securing off site mitigation would be through a Section 106 agreement.

County Highways have provided a response which can be found in Appendix A.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Development Manager
Growth, Highways & Infrastructure

Appendix A County Highways response

“It is understood that the proposed A12 Major Road Network Improvement Scheme relates to the section of the network between Seven Hills and Woods Lane. The scheme will comprise of a series of junction improvements, as well as improvements to walking, cycling and public transport, to meet the overarching objections presented within Paragraph 1.1.5 and Section 3.2 of the submitted Pre-Application Statement (Reference: 70120294-WSP-HGN-XX-RP-CH-002 – March 2024).

As presented within Paragraph 1.1.5 of the submitted Pre-Application Statement, the scheme aims to promote sustainable modes of transport (walking, cycling and passenger transport) that encourages a modal shift and reduce traffic on the A12. This is reinforced within Section 3.2, where a range of objectives are presented, which include an objective to “deliver improvements for all modes of transport including conditions for bus users and accessibility for pedestrians and cyclists to support and encourage walking and cycling” while seeking to “reduce the overall number and severity of casualties associated with the A12”.

Careful consideration will need to be given to the type of infrastructure proposed – particularly

infrastructure associated with sustainable travel modes – to ensure a balance between increasing the number of sustainable travel trips (typically more vulnerable highway users) and reducing the overall number and severity of casualties along the route. Paragraph 3.3.4 of the submitted Pre Application Statement outlines that the proposed package of improvements for pedestrians, cyclists and horse riders will be designed in accordance with CD143, the Suffolk Design: Streets Guide (2022) and Local Transport Note (LTN) 1/20. This approach is supported, and any deviations included within designs submitted with any subsequent formal planning application should be submitted for consideration.

Proposed Improvements for Pedestrians and Cyclists

A12 – just north of the A12 / Barrack Square / Eagle Way junction: consideration should be given to the proposed width of the replacement “Martlesham Footbridge”. It is recognised that the western approach to the bridge is segregated, and should the intention be to segregate the bridge, consideration should be given to the requirements outlined within LTN 1/20 (Section 10.8) alongside any other relevant guidance document(s).

A12 – south of A12 / A1214 Main Road junction: discussions relating to the proposed lighting proposals should be held with the Suffolk Highways Streetlighting team: enquiries@suffolkstreetlighting.org

A12 – north of A12 / Anson Road junction: discussions relating to the proposed lighting proposals should be held with the Suffolk Highways Streetlighting team.

Anson Road / Tesco / Beardmore Park junction: consideration should be given to vehicle flows and traffic speeds on approaches throughout the design process. Table 10-2 and supporting text within LTN 1/20 provides useful guidance on crossing suitability.

Gloster Road / Sandy Lane / A12 - between Seckford Hall Road and the A12 / B1079 Grundisburgh Road junction: consideration should be given to the proposed cycle infrastructure. Proposals should be considered in conjunction with motor traffic flows and traffic speeds and assessed in line with LTN 1/20 (Figure 4.1 and supporting text).

A12 – South of B1079 Grundisburgh Road: consideration should be given to the design of the controlled crossing facility. It is advised that the Suffolk Highways Traffic Signals team are contacted to discuss proposals: trafficsignals@suffolkhighways.org

B1079 Grundisburgh Road: consideration should be given to vehicle flows and traffic speeds on approaches throughout the design process. Table 10-2 and supporting text within LTN 1/20 provides useful guidance on crossing suitability.

A12 – North of Woods Lane: consideration should be given to the proposed cycle infrastructure. Proposals should be considered in conjunction with motor traffic flows and traffic speeds and assessed in line with LTN 1/20 (Figure 4.1 and supporting text). Consideration should also be given to motor traffic flows and traffic speeds and assessed in line with LTN 1/20 when considering the proposed crossing facility.

Proposed Public Transport Improvements

It is recognised that the scheme recommends public transport improvements, as presented within Table 3-3 of the submitted Pre-Application Statement. It is recommended that there is continued collaboration with the Passenger Transport team throughout the development of design proposals.