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24 January 2008

Dear Madam

**Proposed Multi Modal Distribution Centre, Land Adjoining A1120, Creeting St Peter, Part in Stowmarket : Request for further information and evidence pursuant to Paragraph 19 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.**

Further to my letter dated 18 December 2007, I can advise you that following a review of the environmental and other information in support of the application, and liaison with Network Rail and EEDA, I consider that further information is required in order to fully determine the need and justification for the proposals, and related environmental effects.

In short, as relayed to you at our meeting in November 2007, I have strong reservations over the robustness of the rail case related to the scheme, and the appropriateness of the location of the proposal in strategic planning and transportation terms. I can therefore advise that if a viable rail case (which has the support of Network Rail) cannot be made, I would not be in a position to adopt a positive stance in relation to the merits of the proposal.

In addition, justification of the 'essential criteria' for site selection also requires further explanation along with consideration of the suitability of available alternative sites. I have also raised economic impact issues which have been highlighted by EEDA in its consultation response.

The further information and evidence required in order to fully assess the merits of the application proposals is set out below.

**Background**

It is stated in your submitted Planning Statement that the intention is to develop a modern multi modal distribution park to serve the needs of the Haven Gateway Sub – Region, taking advantage of the site's strategic location adjacent to the A14 Trunk Road and the Great Eastern Mainline Railway. The site extends to approximately 45.3 ha (112 acres) in area, and would provide 120,000 m<sup>2</sup> of mainly B8 floor space.

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District Monitoring Officer

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It is also stated that the site would operate as a multi modal distribution facility and container traffic would enter the site from the Haven Gateway Ports on a daily basis, where loads would be broken up and / or reprocessed on site. Goods would then leave on the road and rail network destined for the Midlands or London. It is stated that the proposals are being brought forward in response to growth in the movement of goods through the ports and the need for additional rail freight handling facilities. The supporting documents concentrate on the import of goods and associated freight traffic as opposed to the export of goods and associated traffic.

### **Need & justification for the location & scale of the proposals**

#### **Locational criteria – rail based considerations**

A fundamental consideration is related to the location of the proposed multi modal centre, and the feasibility of developing a viable facility for the movement of a significant proportion of goods by rail, which has the support of Network Rail. In addition, it remains to be proven whether the on and off site rail infrastructure needed to bring forward such a facility can be funded by the project, and is therefore deliverable, or whether the proposals could achieve a significant modal split in favour of rail freight transport.

Network Rail has reservations about the suitability and viability of the proposal and has made the following comments in relation to the scheme;

- The 'break even' distance for a distribution hub (serving maritime intermodal business) is typically circa 150 miles from the Port, and the site's location within 30 miles of the Port could lead to 'double handling' of goods or further road based trips;
- It follows that such facilities should either be located by the port or close to a major population centre (such as London or the Midlands), i.e. being the recipients of the majority of imported goods, otherwise excessive long haul HGV (road based) trips would result;
- The provision of the multi modal facilities in 2013/2014 may duplicate (and therefore conflict with) the provision of and investment in additional rail freight capacity associated with the committed expansion of Felixstowe Trinity Terminal – this may also have the effect of making the Stowmarket rail freight facility obsolete as increased capacity would be available for out and inbound trains serving the port directly, as opposed to utilising an interim rail stop;
- In the interim period (prior to the Felixstowe Port rail capacity improvements) short term container handling and storage capacity may exist at Griffin Wharf, West Bank Terminal (Ipswich) and at Parkeston / Harwich International Port – the role of these facilities therefore needs to be considered;
- The provision of additional rail freight capacity (above) may require the upgrading of the Felixstowe – Nuneaton line and alterations to the Ipswich railway Marshalling Yard to accommodate increased capacity and wagon lengths – the extent to which these works may be needed in conjunction with the application proposals therefore needs to be scoped and costed with Network Rail;
- Due to the track alignment (and configuration) at Stowmarket two sets of points and cross overs would be required (to avoid trains backing up between Stowmarket and Ipswich using extended network capacity and time), at a cost of circa £10 million, which is significantly in excess of the applicant's estimate which is understood to be £2 – 5 million, raising doubt

over the financial viability of the proposals;

- In terms of the modal split, your estimate of two trains serving the site per day carrying 50 x Twenty Foot Equivalent Units each (100 TEU's), compared to 1800 road based (two way) HGV trips, amounting to a 94.5%:5.5% modal split in favour of road based transit is not considered to be significant (or an appropriate) modal split as respects rail based use and potential in policy terms;
- Network Rail has indicated that in order to warrant its support for the scheme a 'business case' would be needed which addressed the issues outlined above, in addition to receiving clear evidence of support from users such as the shipping lines, freight companies and the port itself;

#### **Alternative sites & scale considerations**

The Environmental Statement (ES) states that there are a number of 'essential criteria' which are necessary in order to meet the needs of the distribution businesses who would occupy the site – these comprise the five criteria set out below;

- i) The site should be located within the Newmarket to Felixstowe corridor;
- ii) It should be in close proximity to or have direct access to the A14;
- iii) It should adjoin the Great Eastern Railway Line with access to the Midlands;
- iv) It should provide the opportunity to create a dedicated railway siding;
- v) It should be sufficiently large enough to accommodate 120,000 m<sup>2</sup> of floor space;

In addition to criteria iii) and iv) which have been examined above, the Council has reservations over the validity of the remaining criteria and makes the following observations below;

- Location within the Newmarket to Felixstowe corridor – the rationale for identifying this circa 50 mile corridor is not clear as the optimum location for the siting of a multi modal distribution hub should be driven by the ability to handle container freight either directly at the port(s), or on the edge of a major urban area such as London or the Midlands. This approach is not considered to have been fully explored.
- A14 Trunk Road Access - the objective to have direct access or close proximity 'solely to the A14' is not considered to be justified as there are other trunk routes serving the Haven Gateway Sub Regional Ports (i.e. A12, A120), which may fulfil the stated need and which do not appear to have been assessed - goods are distributed across the South East as well as the Midlands region from these ports, and to focus on one trunk route (given the scale of the proposals) is not considered to be justified at the current time;
- Evidence of Need & Economies of Scale - the stated requirement for a scale of a facility large enough to accommodate up to 120,000 m<sup>2</sup> (1,291,711 ft<sup>2</sup>), is not supported by any robust evidence that such a need exists, or why port related needs cannot be provided on more than one site, particularly as there are a number of allocated sites which are available for this purpose, and either have close linkages with the port(s), or comprise previously developed land within trunk route corridors which should be prioritised above green field release;
- Availability & Suitability of Alternative Sites - a clearer explanation is required of why existing allocated employment sites are not considered to be suitable to meet the port related needs, i.e. such as the Sproughton Sugar Beet Site (40 ha) which is now available for employment purposes following the recently dismissed appeal, and the Felixstowe Portside / Trinity Park

site (30 ha). These opportunities need to be more closely assessed;

The above matters should be thoroughly explored as part of a reasoned justification for the proposals. This work would need to be considered in association with the findings of the Felixstowe Port Land Study commissioned by Suffolk Coastal District Council and its partners, which will determine the future land requirements for the Port, including market demand and a strategy for identifying and bringing forward sites through the LDF processes and the associated timescales.

### **Employment Considerations**

EEDA has indicated that an Economic Impact Assessment should be prepared in order to determine the likely impact of the proposals on the economy and labour market of Stowmarket and the wider Haven Gateway Sub Region. In particular, it should consider the opportunities and constraints of the site location in contrast with other locations within the sub region.

The Study should consider the skills implications arising from the potential use of 45 ha of land for predominantly B8 use, as opposed to an alternative use of the site for a mix of B1, B2 and B8 uses. Analysis is required to support the basis for the estimated 1,360 jobs arising from the proposals including the methodology employed and the nature and split of the jobs, i.e. in terms of the full and part time equivalent positions (fte / pte) and the proportion that are likely to be on or off site.

### **Conclusions**


The District Council's view at this stage is that the strategic case for the proposals remains unproven. Further information is therefore required to enable the justification for the proposals and their consequential impacts to be fully considered.

The required information should include a business case demonstrating the suitability and viability of developing a strategic rail freight facility in this location, which would need to be scoped and agreed in association with Network Rail. The business case should also include an assessment of the needs (and support) for a major multi modal distribution facility on the site, the distribution area and proportion of associated vehicle movements (i.e. what proportion of the goods would be distributed where) and an explanation of how the proportion of goods handled by rail could be significantly increased over the current predicted 94.5% : 5.5% split in favour of road based modes.

Further information should also be provided on the explanation for and justification of the 'essential criteria' and consequential need for a single 45 ha facility, along with an examination of the suitability of alternative sites, and finally the preparation of an Economic Impact Assessment to determine the relevant employment considerations associated with the proposal.

The above content represents the Council's overall strategic planning view and comments, and in addition there may be more detailed environmental issues for you to consider, following your attention to the strategic aspects (and merits) of the proposals, as outlined above.

Yours sincerely



James Lawson  
Consultant to Mid Suffolk DC