

Save Our Country Space SOCS 12/02/25

Planning Inspectorate Appeal for: 24/00172/OUTFL – ‘Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane, Ipswich, Suffolk’ IBC appeal reference: APP/R3515/W/24/3350674

Offsite Transport matters- further to concerns, previously Identified in November Appeal SOCS submission.

SOCS suggest clarification/correction of the following matters are needed by SCC Highways for mitigation and safety. [ID8 SoCG SCC concluding that residual cumulative impacts on road network, would be severe;

‘Areas of agreement

Modelling

2. Following a review of the information provided with Mr Hassel’s Proof and Rebuttal Proof, SCC no longer pursue the modelling objection to the Appeal Scheme and content that based on all of the information which has been provided by the Appellant taken with consideration of the SCTM outputs there would not be an unacceptable impact on highway safety or that the residual cumulative impacts on the road network, following mitigation, would be severe (NPPF 2024 para 116).’

Specifically, we seek clarification of statements made within Proof - [AP6.1 Transport Rev03.1 FINAL w Appendices](#) pdf file 11 MB created on 10/01/2025 11:53am Proof by Mr Hassel; excerpts are quoted below;

‘3.2. Local Highway Network

Tuddenham Road

3.2.4 *Tuddenham Road is a main road, linking Ipswich Town with the satellite village of Tuddenham. The full length of the Tuddenham Road is 1.8 miles (2.9 km) from the south intersecting South Colchester and A1214 Roundabout to Tuddenham village.*

(a) Tuddenham road is not a ‘main road; it is an unclassified or ‘C’ road.¹

3.2.5 *With a road width of approximately 5.5 m Tuddenham Road runs along a short portion (approximately 232 m) of the northern most boundaries of the Site, where Humber Doucy Lane terminates at its most northerly point. Approaching from the east, this section of the road comprises a rail bridge within the national speed limit zone, which becomes a 30mph zone approximately 26 m before the junction with Humber Doucy Lane. The rail bridge road carriageway is approximately 6.5 m wide.*

(b) We feel that Tuddenham Road is intermittently constrained (as little as 4.4 metres road width, as stated by Mr Samuel on behalf of the North Fringe Protection Group on 11/2/2025. It has ‘pinch points’, we say, rendering it unsafe for two passing cars, and for the actual nature of mixed daily traffic on Tuddenham Road and therefore will not adequately meet safety standards – (standards enforced elsewhere see below.)

Design approach statement – Roads HS2-HS2-HW-DAS-000-000002 Revision – P01 Date approved – 17 July 2012²

¹ All UK roads (excluding motorways) fall into the following 4 categories:

- A roads – major roads intended to provide large-scale transport links within or between areas
- B roads – roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network
- classified unnumbered – smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Known unofficially as C roads

² https://assets.publishing.service.gov.uk/media/5a7f2f39e5274a2e8ab4aa29/HS2_Rural_Road_Design_Criteria.pdf

1.5. A set of *design* criteria have therefore been developed for works on rural roads where no other *design* basis is suitable, and it is intended to provide a safe, consistent and proportionate *approach*

Two-lane roads

A.6.3 Rural road widths for diversions should generally match the existing, subject to a minimum of 5.5 metres (the minimum for two cars to pass in safety at low speed).

This minimum width shall be increased to 6.0 metres for lengths with occasional use by buses or heavy goods vehicles and 6.8 metres for roads where buses or heavy goods vehicles are likely to pass each other on a regular basis.

A.6.4 The need for any increased lane width at bends shall be determined on a case-by-case basis using vehicle tracking design tools.

A.6.5 The maximum carriageway width for two-lane roads shall be 7.3 metres (plus any widening on bends that may be required).

A.6.6 Hardstrips shall not be provided on minor two-lane rural roads.

(c) The Tuddenham Road over rail bridge carriageway referenced above, was found on our recent survey and measuring, to be constrained to 4.5 metres, kerb to kerb, not approx. 6.5 metres as stated.

(d) The above approximations and inaccuracies render the route as a secondary main route, unsafe and substandard, as it does not meet rural roads acceptable standards (for example the following rural roads Design approach statement – Roads HS2-HS2-HW-DAS-000-000002 Revision – P01 Date approved – 17 July 2012)

The 2007 Standard used by Mr Hassell, [HW04 Manual for Streets 2007](#) pdf file 4.8 MB created on 03/01/2025 1:21pm, we say, is not suitable for this rural road and secondary route, especially to Westerfield Station.

(e) We, therefore disagree with the following concluding remarks;

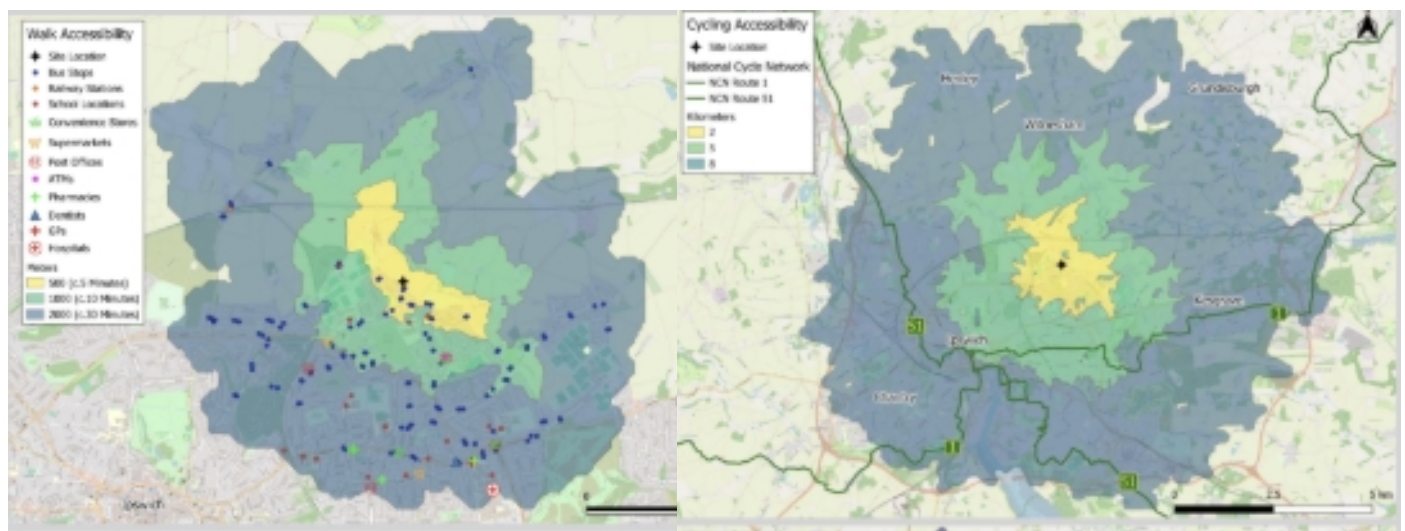
‘4.7. Concluding Remarks on Modelling Matters

4.7.6 Taking account of all of the above, subject to agreement of proportionate mitigation of offsite traffic impacts, I conclude that the Proposed Development is in a sustainable location and there are no grounds for refusal of planning permission in terms of the traffic impact modelling.’

APPENDIX 12

ACCESSIBILITY ISOCHRONES xii

We feel the following accessibility isochrones, **cannot be met safely** with current mitigation reached within the agreed **Statement of Common Ground with Suffolk County Council Highways**.



Justification for concerns: Tuddenham Road over rail bridge just north of site parcel D access point during Network Rail subsidence repairs 2019.



Tailback created on Tuddenham road (for some half a mile north at 10 am due to constrained access over bridge December 2018 and /or other.

