HEARING STATEMENT TOWN END FARM PARTNERSHIP (TEFP) MATTER 6

#### EX6/06/04



#### EXAMINATION OF THE INTERNATIONAL ADVANCED MANUFACTURING PARK (IAMP) AREA ACTION PLAN (AAP)

#### Matter 6: Infrastructure, Transport and Access (Policies T1, T2, T3, T4, IN1 and IN2)

The Town End Farm Partnership are an "interested party" for the purposes of the EiP. They are uniquely qualified to answer questions in relation to the wider IAMP proposals as part of the AAP Examination as they are major freeholders of a significant part of the IAMP with the benefit of a live hybrid planning application supported by robust assessment forming the Environmental Statement and validation documents.

We respond to each question using the Inspectors references;

QUESTION 6.1: Have the implications of the plan for transport and other infrastructure been robustly assessed and are the arrangements in place to ensure that the necessary mitigation is provided at the appropriate time in relation to the development of IAMP?

No. The evidence base of the Transport Assessment PSD 19 it's supporting documents (Prepared by JMP 2016) has not been thoroughly and robustly assessed. TEFP as an interested party have instructed WSP Highway Engineers to review the submission package which seeks to underpin the overall transport and infrastructure delivery/ mitigation package.

The appended report considers the content and technical data provided (Update 2017) by PSD19 including Supporting Documents SD60-67.

Their findings make for compelling reading confirming that the evidence base is far from satisfactory and is not technically sound. The WSP review concludes that the technical evidence which has been made publically available is not proportionate in relation to the scale of analysis which has informed the reporting contained within PSD19.

We submit that the level of technical information contained within the joint authorities documents reviewed is not sufficiently detailed enough to allow comprehensive consideration to be given to the full range of transport implications associated with delivery of the current IAMP AAP proposals.

Indeed, the Traffic flows anticipated to use the proposed new bridge over the A19, appear to primarily constitute existing movements on the wider highway network. It is not considered that the scheme will *"serve as an important link for the distribution of IAMP related traffic"* based upon the volume of trips forecast and is, therefore, **unlikely to be necessary to make the development acceptable in planning terms.** 

We submit that in the absence of clarification regarding concerns raised in relation to traffic data, growth assumptions, adopted trip rates, distribution of generated traffic and model validation, these



points have the potential to undermine the credibility of the technical analysis which has been used to inform the development of policies contained within the IAMP AAP. It is submitted to the Inspector that the plan would require significant levels of modification to be re-assessed and potentially found to be sound.

In Summary, on the advice of WSP/ Parsons Brinckerhoff, TEFP consider that the transport and Infrastructure element which informs the AAP masterplan and policies has not been properly calibrated and therefore suitably validated. What this means is that the assumptions underpinning the infrastructure, Transport and access are not reflecting the actual baseline position. Therefore the joint authorities cannot rely on a sound baseline to make recommendation and propose mitigation which potentially is disproportionate to the scale of the "problem".

On this basis the plan is unsound.



# Appendix 1

# **WSP Parsons Brinckerhoff**

### **Review of Transport Technical Background Report**

### March 2017

# (Attached separately in cover email as PDF)