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**Subject:** MATTER 2d AND Matter 3: SCLP12.35 Innocence Farm

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**From:** Parish Clerk [<mailto:parishclerk@trimley-st-martin.org.uk>]  
**Sent:** 21 October 2019 10:20  
**To:** Annette Feeney  
**Cc:** Ian Cade; Bob Parker; Ryan Osborne  
**Subject:** FW: MATTER 2d AND Matter 3: SCLP12.35 Innocence Farm

Good Morning Annette

As the Inspector has invited comments on the traffic modelling documents numbered H30/31/32 the Cross Boundary Parish Council Group asks for the comments submitted below to be accepted as a response to that invitation. The comments challenge the ESC forecast of HGVs which de-van within 30 miles of the Port of Felixstowe and are thus directly relevant to the content of H30/31/32.

Kind regards

Caroline

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**From:** Parish Clerk [<mailto:parishclerk@trimley-st-martin.org.uk>]  
**Sent:** 16 September 2019 10:39  
**To:** Annette Feeney ([Annette.Feeney@eastsoffolk.gov.uk](mailto:Annette.Feeney@eastsoffolk.gov.uk))  
**Cc:** Bob Parker; Ian Cade; Ryan Osborne ( [REDACTED] )  
**Subject:** MATTER 2d AND Matter 3: SCLP12.35 Innocence Farm

Good Morning Annette

**MATTER 2d AND Matter 3: SCLP12.35 Innocence Farm**

1. Although it is understood that new material is not generally accepted at this juncture, the Cross Boundary Parish Council Group note that the information provided by Lichfields, on behalf of East Suffolk Council, in relation to the handling of containers arriving at the Port of Felixstowe may have resulted in a misleading impression about the extent of de-vanning within 30 miles of the port. In view of the potential significance of this material, the Group have asked me to furnish the inspector with the following information which serves to correct the erroneous impression.
2. The suggestion that 30% of containers arriving at the port of Felixstowe are de-vanned within 30 miles of the Port is a statistic with which those in the industry find wholly at odds with reality. The Chairman of the Felixstowe Port Users Association has informed the Group that the point was discussed at a meeting on 11 September when the view was the true figure fell in the region of 10-15%, or possibly lower. This was supported by views from two of the biggest devanning warehouses in the area where the figure was considered to fall well below 25%.
3. A group member has asked directors of two local logistics companies for information about their practice over the last 12 months; he received the following information:

- a. Company one had not de-vanned a single container within 30 miles of the port.
  - b. Company two had not de-vanned a single container within 30 miles of the port for its direct customers.
  - c. Company two also operates a warehouse for a 3<sup>rd</sup> part logistics company, and approximately 5% of the containers for that 3<sup>rd</sup> party company do get de-vanned within 30 miles of the port (off port).
4. The figure of 30% calculated by Lichfields is the culmination of a series of assumptions which they arrived at on the basis shown below (*Annex D3, Glossary of Terms and Annexes to the Felixstowe Port & Logistics Study, October 2008*). From this it appears that they calculated that the warehouse capacity within the 30 mile zone would be **sufficient** to handle 30% of the TEUs leaving the port, but this is certainly not the same as saying that 30% of the TEU handled by the Port of Felixstowe **is** handled within 30 miles of the port.

The proportion of containers handled within the port centric zone has been calculated at 30% of the total TEU handled at the Port of Felixstowe, equating to 810,000 TEU per year. This figure has been prepared based on the calculation of how many TEU are handled directly adjoining the Port of Felixstowe with an adjustment for the identified sites within the region (Great Blakenham, Ransomes Europark). Table 1 below indicates the respective capacity of warehousing and container storage operations adjoining the port and within 30 miles of the port. These figures are based on specific dwell times and container storage densities for both warehousing and container storage operations<sup>1</sup>.

Operation	Capacity per hectare per year (TEU)	Operations adjoining the port (ha)	Capacity (TEU)	Operations within 30 miles (ha)	Capacity (TEU)	Total Capacity (TEU)
Warehousing	1,045	20	20,909.80	50	52,275	73,184
Container Storage	16,535	19	314,155.50	10	165,345	479,5001
					<b>TOTAL</b>	<b>552,687</b>

The calculated capacity of the surrounding port centric zone is identified as 552,687 TEU per year. However, in taking into consideration the margin for error and the need to plan for growth and a change in operational and technology efficiencies we have taken this figure and applied the following multipliers:

- 15% increase for error (82,903TEU) resulting in 635,588 TEU per year and then
- 27.5% uplift reflecting changes in practice and technology (174,787TEU).

These calculations indicate that the capacity of the existing adjoining operations and those within 30 miles have the capacity to manage 810,000 TEU per annum over the period 2008-2023.

Kind regards

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