

**Dr Daniel Poulter MP**  
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Central Suffolk and North Ipswich



HOUSE OF COMMONS  
LONDON SW1A 0AA

Baroness Vere of Norbiton  
Parliamentary Under Secretary of State  
Department of Transport  
Great Minster House  
[REDACTED]  
London, [REDACTED]

Tuesday, 30<sup>th</sup> June 2020

Dear Baroness Vere,

In my letter to the Secretary of State for Transport of 28<sup>th</sup> January, I called for the re-trunking of the A12 north of Ipswich. You kindly replied in your letter dated 5<sup>th</sup> February 2020, but regrettably it was not received in this office until Thursday, 14<sup>th</sup> May. Please accept my apologies for the delay in this response and note the subsequent delay since the 14<sup>th</sup> May which is due to the work that has gone into preparing this response.

My concerns about the A12 are based on several key issues on which there is further detail below, but briefly they are:

- Calls for improvements to the A12 north of Ipswich have been ongoing since the mid-80s.
- Despite these calls, the last major work to this stretch of road was the Saxmundham bypass which was completed in 1988.
- In the intervening 32 years, traffic has increased by circa 50%
- Two major energy projects are at the DCO stage, EDF's Sizewell C (SZC) proposals and Scottish Power Renewables East Anglia One North and East Anglia Two. Both will entail major construction (in the case of SZC, over at least 12 years) which will heavily impact the A12, and more energy projects are planned.

Writing in your letter about the policy relating to trunking, you state that, "In most cases that means preferring roads to be locally managed by authorities accountable to local people, and trunking only those routes that connect England's main centres of population, major transport hubs and geographically peripheral regions as well as the main links to Scotland and Wales". Absent from this list are areas of strategic importance, which is an important consideration.

The A12 north of Ipswich as a vital strategic highway serving the East Suffolk coast which is now playing an important role in the supply of the UK's clean energy requirements. Last year, Councillor Richard Rout, Cabinet Member for Environment and Public Protection at Suffolk County Council, said when talking about off-shore wind, "It is estimated that these windfarm projects, along with other significant

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developments such as Sizewell C , could see up to 30% of the UK's energy delivered through Suffolk". This makes the coast and the development along it a vital national asset which has hitherto been under-recognised.

You also state that the A12 is part of the Major Roads Network (MRN) and as such the local highway authority has access to the National Roads Fund from which it can obtain contributions to the cost of improvements. It is precisely because we feel that Suffolk County Council Highways has been unable to access the funding that would enable it to invest in key stretches of the A12 north of Ipswich and has failed to deliver the wishes of "local people" that we are advocating the re-trunking of this stretch of the A12.

In your letter you set out the criteria for trunking of roads in England and asked me to put forward some evidence on the issues of concern and I have set out some of the key matters in the notes below. The evidence of concerns over the adequacy of the road is substantial and whilst comprehensive, the list under the various headings in this letter is by no means exhaustive.

## **Brief History**

*A full sequence of relevant dates and facts is set out in Table 1 below under **SEGway – An Example of the Problems of Delays in Improving the A12.***

1. The whole of the A12 was a trunk road until 2001 when the stretch between Ipswich and Lowestoft was de-trunked and responsibility for it passed to Suffolk County Council Highways.
2. The Martlesham bypass was completed in 1984 and Saxmundham bypass in 1988. As far as I am aware, these were the last major capital expenditures on the A12 north of Ipswich. It is acknowledged that some flood resilience work was done in 2014 at Blythburgh, but at a cost of circa £1m this is regarded as a relatively minor expenditure.
3. As an example of the delays to improvements to the A12, plans were first put forward for a "Four Village Bypass" (FVB) of Marlesford, Little Glemham, Stratford St Andrew and Farnham in early 1986. By 1994 the route had been agreed by SoS for Transport and in 1995 the Planning Inspector approved plans for the Wickham Market to Saxmundham improvements – known as the Four Village Bypass (FVB), which was to use the approved "Brown Route B". The works were ready to go to tender in 1996, but the project was axed along with half the other UK roads schemes in the November 1996 Public Expenditure Review.
4. The need persists for improvements along several stretches of the A12 north of Ipswich, including the bypassing of the four villages and has become even more pressing. The shelving in 2019 of Suffolk County Council's (SCC) Suffolk Energy Gateway (SEGway) scheme to bypass the four villages when funding was withdrawn by SoS Transport, came just at the time when EDF were consulting on their plans for two new nuclear reactors at Sizewell on the East Suffolk coast and new offshore wind capacity was coming on stream. The decision to abandon the scheme will undoubtedly limit business growth and job creation along the A12 corridor and has added to the sense that a strategic vision is not being pursued for the A12 which forms the only major north/south road in the east of the county.

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## **Evidence of Concern About the A12**

5. The Department for Transport published *Trunk Roads, England, Into the 1990s* in May 1990, in which it stated an aspiration to make improvements to the A12 and in particular carry out major works between Wickham Market and Saxmundham – this would have seen the delivery of what became known as the FVB and later, SEGway.
6. In 2011, SCC’s “Suffolk Local Transport Plan 2011-2031” recognised that projected residential development along the A12 north of Ipswich would continue to add pressure to the weight of traffic that already exists on this stretch of the A12. Since 2011, further significant residential developments have taken place, notably at Saxmundham and Framlingham and consent has been granted for a 2,000 unit scheme at Adastral Park in Martlesham on the A12 just south of Woodbridge. It is recognised that a key test for justifying road improvements is the delivery of additional housing – East Suffolk Council has plans to do this in order to meet the average annual increase in households up to 2036 of 834.
7. In 2013 AECOM, consultants to SCC, gave early recognition to the heavy impact that the construction of SZC would have on the A12, recognising that there would likely be a “disproportionate increase in peak delays and congestion” largely as a result of the increase in traffic comprising mainly medium and heavy goods traffic unfamiliar with the route and its hazards.
8. Even in the year that plans for SEGway were shelved, in the *Suffolk Coastal Local Plan - Final Draft Plan January 2019* the Council states “The A12 provides the main route north and south through the District and is important to many communities. It is a mixture of dual carriageway and single carriageway and serves a number of settlements. Improvements to sections of the road are proposed at various locations, most notably around the villages of Farnham, Little Glemham, Marlesford and Stratford St Andrew”.
9. The increase in traffic on the A12 presents problems not only for motorists, but for other users of the road such as cyclists and pedestrians. Villages along the A12 are bisected by it and suffer from community severance, in some cases making access to shops and bus services difficult – particularly for the elderly.
10. Despite this recognition of need for improvements to a key strategic route, the residents of East Suffolk are no closer to having a proper solution to the FVB, although under proposals for SZC, EDF are working with SCC to deliver a two village bypass (TVB) around two of the four villages – Stratford St Andrew and Farnham (see paras 15 and 34 below).

## **SEGway – An Example of the Problems of Delays in Improving the A12**

11. SCC consulted on their plans for SEGway in September 2017, citing the benefits as being:
  - Reduced congestion and journey delay
  - Improved journey time reliability providing support for the local economy and improved productivity
  - Reduced community severance
  - Providing the capacity required to enable, support and deliver growth across all economic sectors, including the potential future construction and operation of SZC.
  - Reduction in accidents

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- Improved air quality and reduce noise impacts for communities alongside the A12
- Future proofing the function of the A12 as part of Suffolk's emerging Major Road Network

These benefits have been consistently highlighted over the years and businesses and residents would be forgiven for despairing about the time taken to make a decision on a stretch of road that by common consent needs significant improvement. Plans for a FVB have been mooted since the mid-1980s, as shown in Table 1 below. Businesses need certainty around the delivery of strategic infrastructure and the uncertainty created by the lack of investment in the A12 will undoubtedly have had an impact on businesses' own investment in East Suffolk.

**Table 1. History of the Plans for an A12 Four Village Bypass**

<b>1987</b>	Government first considered need for an improvement to the A12, with a bypass of Stratford St Andrew and Farnham proposed as part of the Roads Programme.
<b>Late 1980s to early 1990s</b>	Further scheme development and consultation undertaken by the Highways Agency. Northern bypass options ruled out for various reasons including deliverability issues and the longer route required.
<b>1995</b>	Long dual carriageway scheme progressed successfully through public inquiry by the Highways Agency. The Inquiry considered 15 alternatives to the HA's preferred scheme. These were all south of the A12 between Marlesford and Stratford St Andrew and included the 1987 proposal and a long single carriageway variant of the dual carriageway. Chosen "Brown Route B" option caused least environmental damage.
<b>1996</b>	Dual carriageway scheme funding lost due to government cuts.
<b>June 2001</b>	A12 road partially de-trunked north of the A14 Seven Hills interchange and control passed to Suffolk County Council.
<b>2006</b>	'A12 Four Villages Study' undertaken by AECOM and TLP on behalf of Suffolk County Council proposed three new road scheme options; including full dual and single carriageway options and a shorter partial route.
<b>2013</b>	'A12 Four Villages Study – Sizewell C Impacts' was a technical note undertaken by AECOM on behalf of Suffolk County Council to aid its response to EDF Energy's initial consultation on Sizewell C. This was a high-level update of the 2006 study with respect to traffic, journey times, accidents and air quality and the business case for a bypass to relieve impacts associated with Sizewell C on the A12.
<b>2014 / 2015</b>	Further study undertaken by AECOM to assess incremental delivery of A12 improvements, which identified short option SB5 bypassing Stratford St Andrew and Farnham as the preferred short route, if a longer route not feasible. Emerging proposals for Sizewell C an important consideration in commissioning the study.
<b>2016</b>	Two long and two short route options to the south and east of the A12 considered as part of Strategic Outline Business Case developed by Mouchel. This confirmed the strategic rationale for the SEGway scheme, and the economic case based on a proportionate assessment of transport costs and benefits in the absence of a detailed transport model. Funding approved for studies in Chancellor's Autumn Statement.
<b>2017</b>	Analysis of the transport user costs and benefits of the four options appraised in the Strategic Outline Business Case with the new Suffolk County Transport Model. Development of Outline Business Case appraising the benefits and impacts of the long dual carriageway and long single carriageway options.
<b>October 2018</b>	Suffolk County Council make bid for funding to Department for Transport
<b>May 2019</b>	Roads Minister in a letter to Daniel Poulter MP confirms that he is unable to support the bid for SEGway. Reasons listed include insufficient value for money,

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	relatively low level of co-investment and the likely adverse impact on the local environment.
<b>January 2020</b>	Request to the SoS Transport by the three Suffolk coast MPs for the re-trunking of the A12 north of Ipswich.

12. The 2019 rejection of the SEGway funding request by DfT was for three reasons: that it was concerned about the overall value for money of the project, it felt SCC had not provided enough money for it and neither had EDF as part of the case to build SZC, and there were concerns about the environmental impact of the road. However, the benefit cost ratio (BCR) for the dual carriage scheme came in at 1.91 on a cost of £133m.
13. In producing the 2017 Business Case for SCC, Jacobs (consultants) said “The Value for Money Statement makes a strong case for the scheme to be considered High Value for Money, with the scheme needing to capture just over £11m of benefits or reduce its costs by £5.6m to be categorised as High value for money (BCR of 2.0), with the lower range of wider impacts associated with Sizewell C and local employment and growth in the tourism economy more than enough to close that gap. With potential Sizewell C developer contributions included in the scheme’s BCR, this is also enough to categorise the scheme as High Value for Money with a BCR of 2.0+”.
14. Jacobs, in their conclusion, went on to say about EDF’s involvement that, “This represents a once in a lifetime opportunity to forward fund the further development of SEGway through the design, consultation, planning, scheme orders and procurement phases. This approach helps provide the best opportunity to capture developer funding to deliver SEGway in advance of Sizewell C’s peak construction.”
15. It is all the more frustrating that in 2020, SEGway remains an unfulfilled objective which, unless an alternative approach can be found quickly will become undeliverable in the foreseeable future. Whilst EDF are willing to make contributions to a TVB this means that only Stratford St Andrew and Farnham of the four villages will get bypassed. Furthermore, the alignment of the TVB precludes it joining with a bypass of Little Glemham and Stratford and will almost certainly mean that this much needed stretch of improvement to the A12 will not happen for at least a generation. This will be an opportunity of strategic importance missed unless action is taken quickly to recognise the full importance of the A12.

### **Traffic Flows on the A12 and the Impact of Sizewell C**

16. Traffic on the A12 has generally risen since the mid-80’s (when FVB was first discussed) and in 1995 the successful FVB Public Inquiry assumed an opening year of 1999 with traffic levels of 15,500 average annual daily traffic (AADT).

**Table 2. Average Annual Daily Traffic (Source Suffolk CC – unless otherwise shown)**

<b>Year</b>	<b>Volume (AADT)</b>	<b>Notes</b>
1988	12,000	
1994	13,500	
2006	16,500	
2012	15,529	
2017	16,600	
2019	18,800	Current average daily (24 hr) weekday all vehicle traffic flows (based on 2015 data) at Marlesford. From EDF Stage 4 Sizewell C consultation.

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2027 (EDF forecast)	21,450	Estimated future weekday daily traffic flows without Sizewell C at Marlesford.
2027 (forecast)	23,300-23,550	Estimated future weekday daily traffic flows with Sizewell C construction traffic at Marlesford.
2031 (forecast)	21,000	AECOM forecast for Suffolk County Council, 2014

17. In its SZC Stage Four Consultation (Summer 2019), EDF indicates that traffic flows on the A12 at Marlesford (without SZC) would increase by 14% between 2018 and 2027 and with the SZC road-led freight delivery strategy, an increase of 25% is expected based on an additional 2,700 daily vehicle movements purely related to SZC. Of these movements 860 per day are expected to be buses and HGVs contributing to an 85% increase in this type of traffic and although quoted for the Marlesford stretch of the A12, similar flows would be predicted on the A12 south of Yoxford and significantly increased traffic on the A12 north of Yoxford. Larger vehicles, due to size, acceleration speeds and deceleration speeds have a greater adverse impact on the operation of junctions and capacity thus creating delays which are likely to encourage drivers to divert to other routes.
18. In their SZC Stage 4 consultation, EDF claimed that SZC traffic is “unlikely to create additional congestion or delays [on the A12]”. In their response, East Suffolk and SCC stated “Specifically, the claim made in paragraph 4.11.2 that Sizewell C traffic is unlikely to create additional congestion or delays is not evidenced and the Councils do not believe this claim to be correct”.
19. Often overlooked is the requirement for maintenance of Sizewell B and the two new reactors of SZC once they are commissioned. All three will require outage maintenance every 18 months, resulting in a rolling outage programme of approximately 6 weeks every 6 months. Each outage is accompanied by a large influx of approximately 1,000 staff and additional traffic which, whilst not on the scale of the SZC construction, nonetheless adds to the quantity of traffic on the A12.
20. It is recognised that the SZC construction project will run for at least twelve years and the disruption in that time to highways and local communities is going to be very severe. A compensating legacy for the period post SZC construction would be proper A12 improvements which would have a lasting benefit to residents and businesses in the area.
21. Jacobs, in their SEGway Strategic Case produced for SCC (December 2017) state as a Key Observation in Section 4.2 “Even if no improvements are made to the existing situation, traffic levels on this section of the A12 are expected to increase, exacerbating current issues. This will be further impacted by increases in traffic associated with growth in the local population and economy and the potential development of Sizewell C power station in the mid-2020s. The flip side of these growth related problems is that planning well and delivering appropriate mitigation early and in advance of absolute need will help to make a strong contribution to the Economic Strategy for Norfolk and Suffolk, Local Plans and Local Transport Plan aims and aspirations – delivering benefits for homes and jobs as well as quality of life”.

This statement from 2017 remains true today and there is no doubt that the needs have continued to increase.

## Business Need

22. The Suffolk coast is now an internationally recognised centre of excellence in the production of renewable energy through its rapidly expanding wind farm industry much of which is serviced out of Lowestoft and Gt Yarmouth at the northern end of the A12. As well as the likelihood that the area will

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produce 30% of the UK's energy requirements by 2030, it is expected that the Suffolk Energy Coast could secure a further 2,300 direct operations and maintenance jobs and 1,500 supply chain jobs associated with the wind farm industry. Together, the Norfolk and Suffolk Energy coasts are branded as part of the East of England Energy Zone which is a global centre of oil, gas, nuclear and renewable energy generation and infrastructure. The region is leading the way in delivering sustainable and clean energy solutions to underpin economic growth across the UK.

23. New Anglia LEP in *Norfolk and Suffolk Unlimited – Local Industrial Strategy* published in September 2019, recognised that committed improvements to date through the Roads Investment Strategy will deliver significant benefits, but additional investment on various major roads in Norfolk and Suffolk is still needed including work to the A12 which will enable the area to take advantage of further growth opportunities.
24. New Anglia LEP has also supported the Great Yarmouth and Lowestoft Enterprise Zone comprising six sites across the coastal towns, supporting the clustering of energy businesses and creation of high-skilled jobs. The zone has the potential to create 18,500 new jobs over the next 25 years. This is particularly important as the town of Lowestoft is recognised as an area of deprivation and has one of the highest levels of unemployment in Suffolk with 2,141 individuals listed as unemployed in October 2019<sup>1</sup>.
25. The East Suffolk coast is also an important tourist destination generating a spend in 2018 of £671m and supporting more than 14,000 jobs.
26. In their advisory note *A12 Four Villages - Sizewell C Traffic Impacts* produced for SCC in February 2013 as part of a review of the readiness of the A12 to accommodate SZC development, AECOM (the consultants to SCC), stated that the A12 also provides an important road link between the communities and businesses in its corridor, pointing out that, “the overall economic vitality of East Suffolk is highly dependent on movement along the A12, and the A12’s importance to national supply chains has been recognised by the Government (Suffolk’s Local Economic Assessment, 2011).”
27. Suffolk County Council’s engagement with businesses in 2016 regarding the A12 revealed the importance of undertaking action for local businesses. The most significant issues for businesses are the predictability of journey times and the perception that this makes the area more unattractive for investment or business expansion. There was also concern about the length of business-related journey times (deliveries, visiting clients) and commuting times for staff. 70% of respondents indicated that improvements to Suffolk’s Energy Gateway would make a Very Significant or Significant difference to their organisation.
28. Jacobs in their 2017 Strategic Case for SEGway made the following observations “New Anglia LEP, Suffolk County Council, Suffolk Coastal District Council and Waveney District Council have set out a balanced yet ambitious approach to delivering growth. This matches investment in skills and infrastructure with support for business to ensure that the region is a well-connected place, with an economy that is inclusive, high performing, productive and international facing, including the centre for the UK’s clean energy sector with this all staffed by a highly skilled workforce”. Jacobs’ view is that the A12 - and specifically the section between Wickham Market (B1078) and Saxmundham (A1094) -

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<sup>1</sup> East Suffolk Council, 2019. *Lowestoft Town Profile*. Available at:  
<https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Town-and-village-profiles/Lowestoft-Town-Profile.pdf>

represents the most pressing need for initial investment to help realise these ambitions in East Suffolk, with future spending on other sections of the A12 and East Suffolk Rail Line to follow.

29. Jacobs identified key problems to be resolved which included:

- Long, unreliable journeys caused by the standard of road and congestion pinch points and the unpredictable impacts of seasonal agricultural and tourism traffic. This pushes up the cost of doing business, reducing productivity and making it less attractive for investment and a barrier to employing skilled staff or those seeking work.
- High traffic flows on summer Fridays and weekends, demonstrating the vital role that the A12 plays in bringing people to the region.
- Poor resilience of the corridor – there is little alternative to the A12.
- Road safety including sub-standard junctions.
- Community severance limiting local residents' access to services and social networks, and an air quality management area in Stratford St. Andrew village.
- Perception of the area from inward investors and leisure visitors as a result of all of these factors.
- Expected increase in traffic flows on the A12 corridor as a result of growth in housing, employment, SZC construction and the tourist industry. This would exacerbate all of the above problems for businesses, visitors and residents alike.

Jacobs concluded that solving these problems through the SEGway scheme would help make the A12 in East Suffolk fit for purpose and help deliver regeneration benefits to towns within Waveney district (which includes Lowestoft) through improved connectivity.

30. In order to support much needed job creation, particularly in the north of East Suffolk and to provide encouragement to the tourism industry, the investment in the A12 which has been called for for so long is now urgently needed, particularly in the light of an SZC construction programme that could go on for 12 years and cause huge disruption on the A12.

### **Policy Fit**

31. It is believed that any improvements to the A12 (including the delivery of SEGway) will be aligned with the outcomes sought by the relevant national, regional and local policy documents including:

- The Government's Industrial Strategy and Clean Growth Strategy.
- The Transport Investment Strategy including the Major Road Network for England, of which the A12 should be a regionally important component.
- The National Policy Statement for Nuclear Power Generation which first set out the potential for SZC.
- The Economic Strategy for Norfolk and Suffolk – which sets out Norfolk's and Suffolk's Energy Coast and the transport corridors within it as a priority place for continued growth and investment.
- Suffolk's Local Transport Plan – which has long stated the need for the scheme.
- Adopted Local Plans for Waveney District Council and Suffolk Coastal District Council which support SEGway.
- Local Plan reviews.
- East Suffolk Tourism Strategy – which sets out the vital role of the sector to growth, employment and wellbeing in East Suffolk and the dependency of it on a fit for purpose transport network.

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- Access to International Gateways – namely the ports of Lowestoft (for servicing the offshore wind industry), Ipswich (UK's largest grain handling port) and Felixstowe (the UK's busiest container port).

## Conclusion

32. The history of failure to deliver improvements to the A12 is long and pre-dates SCC taking responsibility for the road north of Ipswich in 2001 following de-trunking. But the need for a strategic vision for this important major route through east Suffolk is now very urgent, with matters being brought to a head by the submission last month of EDF's SZC Development Consent Order application, which if approved, will result in huge pressures on the A12 during construction. I therefore urge you to consider taking the A12 north of Ipswich back under the control of DfT by re-trunking, in the hope that this will focus the attention of the Department on the urgent need for action.
33. The impact of a continued lack of investment in the A12 will be serious for the coastal area of Suffolk and by common consent will lead to a constraint on economic growth for the foreseeable future. In 2017 my fellow East Suffolk MP Peter Aldous (Member for Waveney), welcomed SCC's plans for SEGway and stated that it would "bring economic benefits to the area, and the constituency of Waveney", and he pointed out that the A12 needs to be flowing freely throughout the year for the region to economically prosper and that there are clear economic and environmental benefits for Suffolk as a whole in pursuing the investment.
34. Whilst the commitment from EDF to contribute towards a TVB of Stratford St Andrew and Farnham is welcomed the currently proposed design will almost certainly preclude (in the foreseeable future) its connection to a bypass of Marlesford and Little Glemham. This means that it is neither a strategic nor sustainable solution and the full benefits of the improvements to the A12 which would result from SEGway will be lost unless urgent action is taken.
35. As SCC has already stated in its Report to Cabinet of 13th September 2019, "SEGWay remains in the Highway Authorities' Local Transport Plan and will remain as an objective that the Councils will return to...". It seems difficult to see how this can be realised without further Government intervention.
36. With the possible intensification of use of the A12 by HGVs and LGVs as a result of SZC and the Scottish Power Renewables projects, an unimproved stretch of the A12 at Marlesford and Little Glemham will not only have to cope with the additional HGV and LGV traffic, but it will also have to accommodate the SZC traffic using a park and ride which will be sited by EDF just outside Marlesford.

The long and frustrating history of struggle for improvements to the A12 leads me to conclude that re-trunking is now the only option likely to bring forward a proper strategic focus to the need and I would ask that you initiate a review of previous reports on the A12 and at the same time consider in depth the recent and likely future industrial and housing development in East Suffolk.

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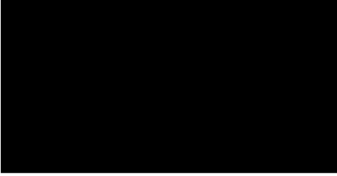
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Please direct any correspondence on this matter to either [REDACTED]@parliament.uk or by post to my Parliamentary Office.

I will look forward to your detailed response to this important issue.

Yours sincerely,



**Dr Daniel Poulter MP**

**Member of Parliament for Central Suffolk and North Ipswich**

**CC:**

**Rt Hon Grant Shapps MP – Secretary of State for Transport**  
**Lord Marlesford**  
**Richard Cooper – Marlesford Parish Council**

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