

Ms. Liz Beighton and Mr. Philip Ridley
Suffolk Coastal District Council
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT

Kirton & Falkenham Parish Council Clerk
17 Grays Orchard
Kirton
Ipswich
IP10 ORE

Dear Ms. Beighton and Mr. Ridley,

This is the response of Kirton and Falkenham Parish Council (the "PC") to DC/17/0010/SCO "Proposed Scoping Opinion for proposed logistics facility at Innocence Farm".

Objection Summary

The PC objects strongly to this application on the grounds of unacceptable process, lack of information on need and the impact on the community; especially traffic fumes, light and noise pollutants.

The ratio of port activity to land is much lower currently than in the past, whilst at the same time the Port and Bidwells/Trinity College have stated that currently they are not progressing developments for port related facilities on both greenfield and brownfield land in accordance with previous planning permissions. The issues are so great that the PC cannot see a basis for SCDC giving approval for Bidwells to progress this to the scoping stage.

To grant any form of permission, or give any positive indication to the current application, when there are unused permissions, especially unused permission in respect of brown field sites, would be perverse. It would also be contrary to the Local Plan.

Process underlying this application.

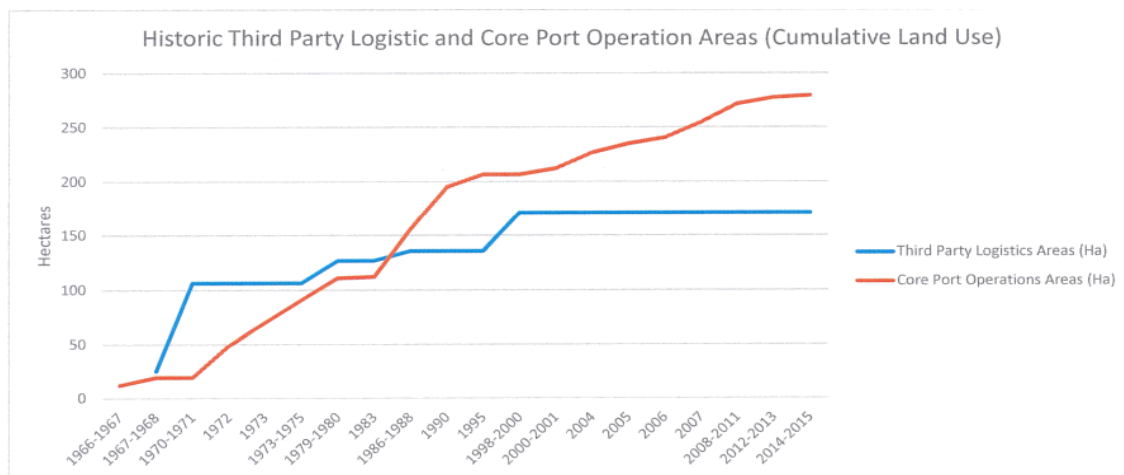
1. The covering letter from SCDC (6/1/17) states that this is a 'planning application'. Please can you confirm whether this is really the case? The covering letter from Bidwells (3/1/17) states that this is a 'request for scoping opinion' and asks SCDC for a 'development brief'. Please explain by return how the Council proposes treating this application.
2. If SCDC provides a 'scoping opinion' then this would appear to be a decision by SCDC in principle, without having the full information of need and impact. Such a decision by SCDC in the timescale set and with such minimal information would be wholly inappropriate and would raise questions as to the propriety of the Council's procedures.
3. This application includes a letter from Bidwells (22/8/16) to Mr. Ridley, providing outline information on the proposal to Mr. Ridley with eight appendices. That appears to constitute the totality of this application. This information was not provided to the Parish Council until 6/1/17, giving the PC only twenty days to respond. This tight timetable has placed the PC at an unacceptable disadvantage. The PC notes that SCDC appears to have held on to this information for five months.
4. Bidwells (3/1/17) state that a statement of the need of the development will be produced only after the SCDC opinion is provided. It is not logical for SCDC or any consultee to provide

an opinion prior to a statement of need. The PC would invite SCDC to require a detailed statement of need before taking any further steps.

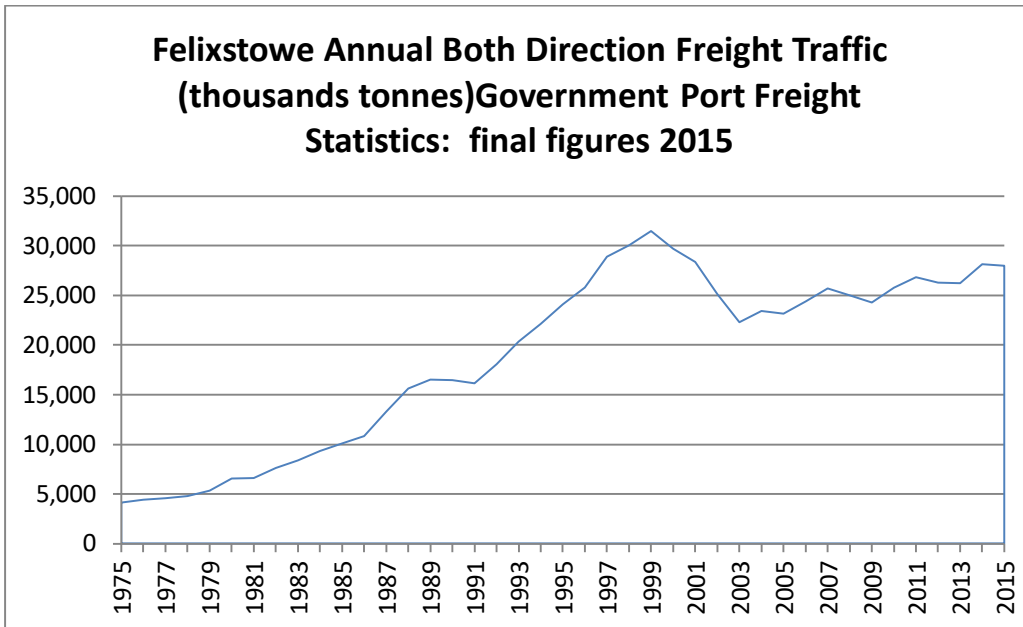
5. The letter from Bidwells (3/1/17) states that there have been discussions between Bidwells and SCDC. The letter from Bidwells (22/8/16) refers to the proposal following a meeting between SCDC at the Port of Felixstowe in April 2016 and that joint scoping meetings with SCDC should be held. There has been no release of the contents or outcomes of these discussions. Please send copies of minutes of all such meetings by return.
6. It is assumed that such discussions are not in camera and that, giving its significance, notes will have been made. It is essential that the PC and other consultees are given access to all planning application information
7. Bidwells (3/1/17) state that SCDC have offered a previous opinion on the proposed development or one at Christmasyards Wood – the wording is ambiguous. It states that Bidwells have taken their lead from SCDC’s previous opinion. This has not been made available to consultees; please can this be provided since it is essential that consultees are aware of this opinion.
8. The application states as an essential feature that car access is via Kirton Road, and then states that current thoughts are for this not to be the case. Given that the application is contradictory in this respect, it is respectfully suggested that SCDC can do little other than reject it.

Strategic Case

1. The application sets out at some length the historic growth of land use of the port and port related activities – graph below; but it is seriously deficient in that it does not provide any information on the historic throughput which is generating the ‘intense’ and ‘urgent’ pressure.



However, the government does provide information (Government Port Freight Statistics: final figures 2015) which is represented in the graph below.



As can be seen, the maximum throughput was in 1999 and the throughput at the end of 2015 was well below this. The port operation land area in 1999 was approximately 70 Ha lower than it is currently. In summary at the end of 2015 its throughput was approximately 10% less than current whilst using approximately 25% less core port operations land than current. This entirely undermines the claim of an urgent and intense need due to growth.

Future Land Growth

Current planning permissions not progressing:

1. Port Logistics Area:
SCDC has granted planning permission for the development of the Port Logistics Area within the port site. The Port has reported that, due to the economic environment, investors for this development have backed out and that they are not progressing as per the planning permission, but that smaller scale developments are now being considered.
2. Uniserve/Clicketts Hill:
SCDC has granted planning permission for a third party logistics centre warehouse at Clicketts Hill, believed also to be a Bidwells/Trinity College site. The Port has reported that, due to the economic environment, investors for this development have also backed out and that they are not progressing as per the planning permission.
3. Brownfield Sites:
Plan 2 of the application shows large hatched areas of Potential Container Storage, Potential Haulage Zone and Potential Warehousing, which are brownfield sites within the current port site that are not currently being developed.
4. Summary:
Until Bidwells, Trinity College and the Port of Felixstowe have developed sites with existing planning permissions and long term brownfield areas within the port boundary, it would be irresponsible to approve in principle or give encouragement for further planning permission applications for greenfield sites, such as this. The track record of recent years is that implementation may not take place even if permission were to be granted.

This application could be considered as a process of Land Banking; i.e. creating a portfolio of greenfield sites with planning permission, whilst leaving brownfield sites which are probably more costly to develop.

Highways

1. The traffic plan has been poorly thought through and is badly flawed. No encouragement for further work should be given unless this has been adequately addressed.
2. The application is for 3,200 HGVs and 600 car movements per day; i.e. one every 10 seconds should 24 hour working be permitted. The proposed access, initially via two small access roads serving Kirton, is clearly impractical; the roads have weight restrictions with restrictions and are used for domestic and farm purposes, as well as the school run and by cyclists and horse riders.
3. There is no access to Croft Lane from the port direction, so all traffic from the port would need to go to the Seven Hills junction turn 360 degrees and return, that going from the proposed site towards Ipswich would need to go to the Trimley or Dock Spur roundabouts; doubling the increased traffic between the junctions and increasing congestion on the Seven Hills roundabout, which is already heavily congested at peak times.
4. The impact on narrow village roads would be extreme, the impact on the A14 and the Seven Hills and Trimley/Dock Spur roundabouts, with consequential slow moving, polluting tail-backs; the generation of pollution by slow moving diesel engines would be very significant.

Environment

1. Noise and light pollution. The Parish Council has repeatedly indicated to Bidwells and Trinity College that a great concern is not only visual impact, but also noise and light pollution. Both of these are very insidious and extremely difficult to mitigate. It is very disappointing that these have not been addressed in any way.
2. Nitrogen dioxide, carbon monoxide and other fumes pollution. The impact of diesel fumes has received a great deal of attention recently. Two studies are listed below as examples:
 - a. Dementia Risk. "The evidence from experimental work suggests that ultra-fine particles from engines do get taken up through the lungs, circulate in the body and produce inflammation," "That has been implicated in a variety of diseases and it now appears we have evidence that would suggest a similar link for dementia." (TheTimes; "Busy roads put millions at higher risk of dementia", 5/1/17 citing Calderón-Garcidueñas, Lilian et al., Living close to heavy traffic roads, air pollution, and dementia", The Lancet, 4/1/17.
 - b. Effect on young and others. The proposed logistics facility reaches the edge of Trimley St. Martin and is very close to its school. The enormous quantity of traffic, in particular of slow moving vehicles within the facility would emit considerable quantities of carbon monoxide, nitrogen dioxide, PM₁₀ and other pollutants into the ambient air of the school and nearby. SCDC and SCC's responsibilities are recognised in the website, but their responsibilities for pollution go far beyond what is stated. The DEFRA report ("Draft plans to improve air quality in the UK, Tackling nitrogen dioxide in our towns and cities, UK overview document", DEFRA, September 2015) addressing EC Directive 2008/50/EC and the 2010 Air Quality Standard Regulations (2010/1001) require the drawing up of plans which limit the levels of such pollutants. It is understood the Government has accepted an obligation to publish a more stringent plan limiting nitrogen dioxide emissions still further (<http://www.bbc.co.uk/news/science-environment-37847787>).
 - c. To permit development which allowed these limits to be exceeded would be both irresponsible and contrary to central government policy. It might also invite legal challenge from those concerned with limiting vehicle exhaust emissions.

In all those circumstances, the PCC would invite the SCDC to refuse this application.

Yours sincerely,

Colin Shaw, clerk to Kirton & Falkenham Parish Council.

20th January 2017.