

Trimley St Martin Parish Council

DC/17/0010/SCO Innocence Farm- Comments on Scoping Opinion Request

The Parish Council of Trimley St Martin has considered the invitation to comment on the request lodged by Bidwells for a scoping opinion in relation to a proposed development at Innocence Farm. The PC notes the confirmation provided to the Clerk by Liz Beighton that the request is for comments in relation to the scoping opinion only, and that no application for permission has yet been submitted. The comments of the PC are as follows:

1. A scoping opinion is a view on the information to be included in the environmental assessment. It is disappointing that this request was issued to consultees in a format which suggested, incorrectly, that a formal planning application had been submitted. This has caused considerable confusion throughout the area which could have been avoided had the consultation documentation been issued with a clear explanation of the nature and status of the request.
2. The Parish Council notes that the exact nature of the proposals to be brought forward has not yet been decided. In consequence, the request is extremely difficult to follow as many of the supporting documents have been drawn directly from the 2009 submission with an overlay of more recent, and sometimes contradictory, material. This is most striking in relation to the question of vehicular access to the site (see para 6 below).
3. Bidwells state their intention to include details of the alternatives they have considered in the environmental assessment. This does not go far enough. In weighing this site against other options, the Parish Council understands that proper practice is to include in the environmental assessment the main reasons for the choice made taking environmental effects into account. Bidwells give the impression that alternatives have already been considered and ruled out, even though the environmental impact assessment of the Innocence Farm proposal has barely begun. It follows that the applicants must have failed to take account of the environmental impact of the Innocence Farm proposal when making their assessment of the options. A detailed option appraisal should be set out in full, be clear to all, and should include consideration of brownfield sites elsewhere in the area as well as assessing

the extent to which spare capacity could be made available at existing third party logistics facilities along the main arterial routes to the north and west of the county.

People & Communities

4. The Parish Council would expect the environmental statement to include, among other things, a clear indication of all those aspects of the environment likely to be significantly affected by the proposed development. There are many issues to be addressed here, and Bidwells have listed some of them, but what is most striking is that they have not identified the impact of the proposals on people and communities as a factor for consideration. This is a serious omission.
5. The impact on people and communities must be included and must address all relevant factors to include, among other things:
 - a) The impact on residents living near to the development including the impact on their health, fitness, and mental wellbeing, the impact on their quiet enjoyment of their properties and the impact on their buildings and the associated infrastructure;
 - b) The impact on residents living at a greater distance, but still within sight and/or sound of the development;
 - c) The impact on community facilities such as the school and its playing field and local businesses such as the farm shop and the gallery;
 - d) The impact of the development, on the health, fitness, and mental wellbeing on children attending Trimley St Martin Primary school and their parents or guardians;
 - e) The impact of the further separation - by dint of increased traffic and inadequate provision for pedestrians - of the part of Trimley St Martin which lies on the Kirton side of the A14 from the remainder of the village as well as the inevitable greater separation between the villages of Kirton & Falkenham and the Trimleys;
 - f) The impact on older children who currently use Kirton Road to cycle to the Academy and others using the cycle route along Kirton Road to get to work or for leisure purposes;

- g) The visual impact of a pedestrian bridge spanning both the A14 and Kirton Road and the off-putting effect of such an enormous structure on pedestrians, especially children;
- h) The impact on leisure users, including equestrians accessing the bridleway and ramblers accessing the Suffolk Coastal path via Capel Hall Lane.

Transport Assessment

6. The extent of the proposal is not at all clear at present. In the letter dated 22 August from Andrew Blackwell of Bidwells to Philip Ridley, Mr Blackwell writes of Trinity's wish to explore options for the land informed by an up to date understanding of the port and logistical requirements. Reference is made to 3,200 container lorries and 600 cars accessing the site each day and the letter refers to access from Kirton Road with heavy goods vehicles accessing the site from Croft Lane. In seeming contradiction of this he later writes that current thought now excludes Kirton Road having direct access except, possibly, for use in emergencies and yet the accompanying documents appear to be those which supported the earlier application and which are based on vehicular access via Kirton Road including a new pedestrian bridge spanning both the A14 and Kirton Road as well as a roundabout at the site entrance on Kirton Road.
7. The proposed Transport Assessment is said to be intended to cover trip rates, numbers entering and leaving the site, distribution flows and impact on the trunk and local road network. To assess the true environmental impact of the proposals it should reflect, among other things:
 - a) That the increased traffic flow will not be simply an increase on existing flow, but rather it would be additional to current flow plus the traffic which will stem from the already planned increase in residential housing on the Felixstowe Peninsula;
 - b) an assessment of the impact of other traffic which would use any widened road, or any additional or improved junction to shorten or speed up journeys;

- c) The impact on the safety of local road users;
- d) The potential for delay to of the emergency services to reach local villages both during the construction phase and later as a result of vastly increased traffic;
- e) The impact on local infrastructure.

Timescales

8. There is no indication of the timescales involved, but there are references to the short and long term with no indication of duration. The environmental impact of the proposals during any construction phase will vary according to the duration of that phase, similarly, the impact will vary where it is proposed that some interim arrangement should be put in place, as with the supposed temporary use of Kirton Road as an access to the site. It seems probable, given the scale of the proposals, that the construction phase may be very lengthy indeed. In the circumstances it is essential that timescales should be clearly set out in the environmental assessment.

Conclusion

9. The negative environmental impact of the proposals under consideration is so great that it seems impossible that they could be counterbalanced by any advantage accruing from the development.

Caroline Ley
Parish Clerk to Trimley St Martin