

Response by the Cross-Boundary Parish Council Innocence Farm Group, comprising representatives from Trimley St. Martin, Trimley St. Mary, Kirton & Falkenham, Levington & Stratton Hall and Bucklesham Parish Councils, to the Draft Local Plan consultation with respect to draft policy SCLP12.30 development of Innocence Farm.

1. The Cross-Boundary Parish Council Group have analysed the Draft Local Plan (DLP) and the evidence base documents. We present clear evidence that draft policy SCLP12.30 is unsound. The evidence base and the DLP are contradictory. There is no evidence that the Duty of Cooperation with neighbouring councils has been carried out. On the contrary, the opposite appears to be the case; when the industrial land allocations for port related use of neighbouring councils is considered, the planning permissions already granted greatly exceed even the highest of SCDC's forecasts for land requirement.
2. The Cross-Boundary Parish Council Group have considered proposed policy SCLP12.30 under broad headings:
 - Is there a need for a site of this size for port related use?
 - If there is a need, is Innocence Farm the right location?
 - **If** there is a demonstrable need and **if** Innocence Farm is identified as the most a suitable site to meet that need, what reassurance is offered to local people that the environmental impacts are going to be properly addressed and their interests protected

Need for a site for port related use

3. No evidence has been presented within the draft local plan or the associated documents which supports a need for a site as large as Innocence Farm (116ha) for port related use. Much has been made of its considerable size, but no evidence of a demand has been put forward. The consultees listed at Appendix 2 of the "Port of Felixstowe Growth and Development Needs Study" attended a stakeholders' meeting and for many of them this is where the consultation ended. The results of the stakeholder meeting are set out at Appendix 3 of the report, but do not include a call for a single very large site.
4. The forecast extra employment for Transport and Logistics is 440 jobs and for Wholesale and Distribution is 180 jobs. The land required to support this is 14Ha (*Ipswich Economic Area Employment Land Supply Assessment: Suffolk Coastal" March 2018*). The DLP rounds down this requirement for new industrial land to 13Ha in its introductory chapters. It then ignores this figure and adopts a figure of a further 26 to 113 Ha of land requirement emanating from discussions with stakeholders in the *Port of Felixstowe Growth and Development Needs Study*.
5. In the *Port of Felixstowe Growth and Development Needs Study* commissioned by the District Council, Lichfields translate container trade forecasts into requirements for off-port land. They say, "... this results in a range of between 26.3 ha (under the Low case) and 103.8 ha (under the High case), with the Central case falling broadly in between and suggesting 66.9 ha" But this land does not have to be sourced from new allocations. As the consultants make clear at paragraph 6.13 "Based on latest Council monitoring data, the existing pipeline supply of employment land that is in close proximity to the Port of Felixstowe and considered suitable for port-related activities totals just over 67 ha. This quantum would be sufficient – in quantitative terms – to accommodate the low and central case growth scenarios, while additional land would be required to meet the high growth case in full."
6. The report focuses largely on land which is available east of the Orwell Bridge. The report states that this is essential to meet next day deliveries for Logistic Centres, which it states should be

east of the Orwell Bridge to overcome any delays caused when this bottleneck is closed. This rationale is self-contradictory and makes no sense since the west (inland) distribution element of such an enterprise would suffer significantly more disruption arising from Orwell Bridge closure than the comparatively infrequent arrivals of HGV containers to the enterprise from the Port of Felixstowe. It would be more logical for distribution-type enterprises, wishing to minimise disruption arising from Orwell Bridge closure, to be located to the west (the inland) side of the Orwell Bridge. It is particularly important that any assessment of employment land needs is considered in liaison with neighbouring districts.

7. The lack of progress in developing sites within and very close to the port is evidence that demand is not sufficient to generate investment in construction for existing sites with planning permission. The Port of Felixstowe Logistics Park (13Ha), which benefits from the grant of planning permission, has not begun construction, even though planning permission was granted four years ago (P13, Port of Felixstowe Growth and Development Needs Study). This is a brownfield site that should be brought into use before any further green-field land is allocated. The sites of the derelict Routemaster Hotel and Anzani House office block are also very close to the port perimeter. We were informed by a council official during the drop in meeting of the consultation that brownfield land is more expensive to build on; the relevance of that in planning terms is not addressed in the DLP.
8. The group looked at the current position for land between the Port and Bury St Edmunds and found availability as detailed below:

Sites for port related use already granted planning permission

Site	Size (Ha)	Road miles from port	District Council
Existing approved land supply identified by SCDC for B8 use within A14 corridor Including:	67 Ha		Suffolk Coastal
Felixstowe Logistics Park	(13 Ha)	0	East of O. Bridge
Clickett's Hill	(10 Ha)	2	East of O. Bridge
Orwell Crossing	(26 Ha)	11	East of O. Bridge
Total of 49 Ha East of Orwell Bridge Total of 67 Ha within Suffolk Coastal			
Sproughton Enterprise Park	35	17	Babergh
Great Blakenham Logistics Park	16	20	Mid Suffolk
Gateway 14 (adjacent to Stowmarket East)	30	26	Mid Suffolk
Stowmarket East	13	26	Mid Suffolk
Suffolk Business Park	23	39	West Suffolk
Total of 184 Ha already allocated and with planning permissions.			

9. Existing permissions for port related use total over 184Ha. So, without Innocence Farm, there are already planning permissions for 175% of the highest forecast of land requirements for warehousing etc. The argument that all this land, already given planning permission and allocated, should be ignored in favour of land nearer the port is negated by the fact that

Felixstowe Logistics Park and Clickett's Hill, both closer to the port than Innocence Farm, have not been developed four years after planning permission was granted.

10. All district councils within Suffolk are keen to secure warehousing business within their boundaries - it seems to be the easy option - but unless districts work together to establish exactly what is needed across the wider area they will be doing their residents a great disservice.
11. It is extraordinary the Suffolk Coastal District Council have not taken into account the inevitable affect that automation will have on logistics and warehousing business jobs.
12. The local plan has a lengthy shelf life and the inclusion of an unsuitable site such as Innocence Farm for port related purposes diminishes the opportunity for satisfying the need for employment land using other more suitable sites.

Is Innocence Farm the Right Location?

13. Having demonstrated very clearly that there is no need for this allocation, the question of whether Innocence Farm is the right location becomes largely theoretical. Nevertheless, there are important factors which need to be addressed here. Lichfields conducted an evaluation of 10 possible sites in a manner which is illogical, and which seems to have been designed to predetermine Innocence Farm as the best option. Some of the flaws in the evaluation are set out below:
 - a. Six factors are assessed for each site out of a score of 5 making a potential maximum score of 30 for the ideal site. This is an irrational approach as the decision to rate each characteristic out of 5 suggests that each characteristic is of equal importance, an assertion which the evaluation does not even attempt to justify.
 - b. Proximity to the port, which is presented elsewhere as a factor of major importance, is not one of the characteristics evaluated except insofar as all sites are located between the port and the Orwell Bridge
 - c. There is a complete absence in the site selection criteria of the impact of generated chemical and particulate pollution on neighbouring settlements. This does not prevent P521, *Draft Strategic Housing and Economic Land Availability Assessment*) asserting that 'there are no issues identified' of 'compatibility with neighbouring uses' and gives a green assessment for this. Kirton & Falkenham Parish Council made a detailed submission on this during the Issues & Options consultation. Ignoring this issue in the site selection criteria can best be described as a glaring omission.
 - d. *Page 727 of Interim Sustainability Appraisal Report of the Suffolk Coastal First Draft Local Plan Appendices June 2018*) gives a green scoring of positive to 'Improve the health...'. It is perverse that SCDC should claim this document as robust and credible when it claims that converting 114 Ha from agricultural use to industrial use with noise, light and chemical pollution from the proposed 24 hour activities, including diesel particulates from 3,200 HGV movements, is considered a 'green positive'.
 - e. The question of whether a site is situated west or east of the A14 has not had any bearing on the score awarded for strategic road access.
 - f. The huge infrastructure demands of enabling access to the trunk road network do not impact on the scoring except in relation to Christmasyard Wood. As far as Innocence Farm is concerned, the point is made in the evaluation that significant junction improvements would be required, but the site inexplicably still gets full marks for strategic road access allowing for no differentiation between that site and the far more readily accessible site at Seven Hills.

- g. When assessing site ownership and availability it appears that 0 or 5 are the only possible scores. 5 has been awarded where the site has been identified as having been put forward by the owner for port related use, all other sites score 0. Unfortunately, the scoring here does not accurately reflect the views put forward by the landowners. There is no evidence that all the landowners of the sites have been contacted.
- h. The costs of developing the sites and putting the necessary infrastructure in place are not considered in the evaluation, indeed, no attempt seems to have been made to make any assessment of costs

Transport Model, HGV & Rail Links

14. The difficulties that would be experienced in providing suitable road access to Innocence Farm are acknowledged in the draft plan. It is difficult to see how the Transport Modelling report could have informed the draft local plan given that it was not published until several weeks after the plan was circulated, however now that it has been issued it is even more apparent that the burden on the road system would be untenable for the reasons set out below.
- a. Astonishingly the report fails to consider the impact of the HGV traffic which would be associated with the site.
 - b. Quite who would pay for the massive changes which would be required has not been addressed even though this should be a key site selection criterion.
 - c. The information contained in the Transport Modelling Report cannot be relied upon to provide a realistic forecast of the impact of the use of the land for port related purposes. It ignores the Landowner's estimate of 3,200 HGV movements to and from the site per day. Instead it assumes that the effect on the A14 and local roads will be in line with the national average increase. The report concentrates instead on the impact of employee's private vehicles.
 - d. The table at Appendix A of the methodology report illustrates Scenario A. According to this the final site area to be modelled at Innocence Farm is 80,000 sqm i.e. just 8 hectares which is a small fraction of the land area under consideration for development which totals 116 hectares. For the purposes of scenario B we see that the land area modelled for Innocence Farm has doubled to 160,000 sqm which is still only 14% of the total land area. It does not attempt to model the proposed policy of allocating the entire site.
 - e. Given the small proportion of the site included in the model, we must assume that one or more of the following applies:
 - the figures are incorrect, or
 - the intention is to opt for a form of creeping development, starting small and growing over the years. (If this is the case then it needs to be spelled out very clearly and an explanation offered to explain why the land is needed if it is not to be used) or
 - a small part of the whole will be used for warehousing with the remainder used as container storage and HGV parking. (If this is the case, it casts further doubt on the question of why a valuable site such as Innocence Farm would be considered the most suitable.)
 - f. Appendix D of the methodology report illustrates the number of trips which the development is expected to generate; morning arrivals are estimated at 109. That appears entirely

inconsistent with the assertion, in scenario A, that a total of 1081 jobs will be associated with the development of Innocence Farm .

- g. We have been told that this analysis relates primarily to car use by employees; it does not reflect the proposed use of the land, nor Bidwell's own assessment of 3,200 vehicle movements a day. The impacts of westbound HGV traffic destined for the site via the Seven Hills roundabout, and the impact of westbound HGV/LGV traffic via the dock spur roundabout, have not been modelled. A model that does not take account of the massive HGV movement associated with the site and apparently assumes that the workforce will, by and large, arrive by bicycle (there is no bus service) is not credible.
 - h. In the main transport report there is some recognition that Innocence Farm will have an impact as can be seen from para 4.3.5 which reads *"The difference in junctions which show stress in terms of their overall V/C in Model Runs 4 and 5 compared to Model Run 2 highlights the inclusion of the additional allocations north of Felixstowe, south of Saxmundham and at Innocence Farm do not have a significant impact in terms of overall junction V/C beyond Suffolk Coastal."* This is small comfort to those living within the area whose concern over the vast impact of this development is unlikely to be assuaged by the knowledge that it will not present much of a problem outside the district.
 - i. The narrative DLP (12.242) states that Innocence Farm 'require(s) upgraded access points to the A14 and the local road network'. It refers to employment land use of the existing access road to Innocence Farm 'should be restricted from using Innocence Farm and nearby roads through Kirton'. However the Transport Model, written after the DLP, proposed that the traffic should go through the local road network.
15. Appendices H & I of Draft Local Plan states that Innocence Farm *'is well connected to the A14 and railway line'*. It fails to mention that the closest part of Innocence Farm to the railway line is approximately 250m and separated by the A14, thereby requiring a considerable infrastructure development to connect the two. Other sites, such as 347, 114 and 707, amongst many others, are closer or adjacent to the railway line, and yet, bizarrely, this is not mentioned in their assessments. The implication is of a predisposition of the DLP towards Innocence Farm.
16. The idea of linking in to the Felixstowe Branch line has been mentioned, but , although it sounds superficially pleasing, there is no evidence that this has been thought-through in depth and no indication that the idea has been explored by or with Network Rail. Given the vast expense currently associated with creating the passing loop on the line it seems highly unlikely that the suggestion of a link between Innocence Farm and the railway could ever be financially viable. We understand that access from the rail siding to the port could only be achieved by reversing along the main line, which would require two locos and two drivers as well as occupying the line to the detriment of all other traffic.

Mitigation of Environmental Impact

17. If there is determination to allocate the land for port related use despite all the evidence to show that a) there is no need for an additional allocation of land for port related use, and b) Innocence Farm is an unsuitable location, then the environmental impact must be taken very seriously and explored in advance of allocation. Numerous factors relating to the environmental impact of a port related use for Innocence Farm were set out in this group's submission at the Issues and Options stage although these seem to have been largely ignored. In summary, residential property backs onto the land and there is a primary school and playing field only a

short distance away. 24 hour working with the resultant air pollution, light pollution and noise would be unconscionable in this rural environment.

18. Policy SCLP12.30 is extremely vague. Beyond saying that this site is to be used for port related purposes, exactly how it is to be used is left open in the interests of 'flexibility'. The provision of landscaping and buffers on the site is not described in any detail - much more information is needed before a clear idea of the potential impact can be gleaned. To leave so much open is unacceptable for those living nearby who may face the possibility of 20 years of blight ahead. Residents need to have some certainty about the protection which will be provided for them, but this policy offers none.

Submitted on behalf of the Cross-Boundary Parish Council Group

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