

Cross Boundary Parish Council Group

Issues & Options Document

Comments on Site 706 Innocence Farm

The suggestion that Innocence Farm should be considered for use for storage and distribution has been considered by a group made up of representatives of the Parish Councils of Bucklesham, Kirton and Falkenham, Levington and Stratton Hall, Trimley St Martin and Trimley St Mary. The comments of the group are set out below, grouped under three broad headings: need, impact on the local area, and traffic and infrastructure issues.

1. Has a need been established?

2. No evidence has been presented to show that a site of this size is required for port related use. The EEFM 2016 indicates a reduction in the overall demand for warehousing space within the Suffolk Coastal area from 477,000sqm in 2014 to 474,000sqm in 2036. Given the lack of evidence supporting a demand for increased provision, an objective independent assessment is needed to determine what level of need exists.
 - a. No evidence has been presented to show that a site of this size is required for port related use. An objective independent assessment is needed to determine what level of need exists.
 - b. Sites for which permissions already exist remain available and yet unused within the vicinity of the port.
 - c. Storage and distribution uses demand large amounts of land, but do not generate a large number of jobs. New facilities are built with automation in mind, so it cannot be assumed that jobs will be created at the same density as at existing facilities. Price Waterhouse Cooper report that up to 30% of UK jobs could potentially be at high risk of automation by the early 2030s and that the impact appears highest in sectors such as transportation and storage where 56% of jobs could be at risk (PWC UK Economic Outlook March 2017). The figures in the evidence base should be interpreted in the light of this.
 - d. The peninsula cannot and should not be dependent solely on port related activities for work. A greater emphasis must be placed on attracting a range of businesses to the area capable of providing a significant numbers of good quality jobs for local people.

3. Impact on the local area

- a. If the site is allocated for storage and distribution use with the intention that this should be realised at some unknown point within the 20-year life of the Local Plan, the blight experienced by homeowners in Innocence Lane and Kirton Road will be considerable, not just for a year or two, but for many years to come. More widely, the villages of Trimley St Martin, Kirton and Falkenham will also be adversely affected. This threat of development needs to be ruled out at the earliest

opportunity, residents should not be expected to live with it hanging over them indefinitely.

- b. The site is very close to a primary school and its playing field; it is also close to the Kirton recreation ground and play facilities. Given the well-established connection between exposure to air pollutants and adverse health outcomes for children it is unconscionable that this site should be seriously considered for storage and distribution use.
- c. A development of this size alongside the A14 moves us closer to ribbon development and runs contrary to the existing principle of supporting distinct and separate communities

4. Traffic and Infrastructure

- a. The existing A14/Croft Lane junction is wholly unsuited to heavy use. The site could not be safely used without the creation of a suitable grade separated junction, but this would be a major undertaking with likely costs running into tens of millions of pounds and the impact of it would be to change the nature of the area beyond recognition.
- b. Access to the site raises serious problems. HGVs travelling to the site from the Port of Felixstowe would need to continue along the A14 to Seven Hills to turn around and return on the eastbound carriageway; Seven Hills is, of course, already congested at busy times and improvements to that junction would be required. HGVs leaving the site to travel westward would first have to travel to the dock spur roundabout to turn around and return. These additional trips would seriously increase pollution in the local area and represent a particular danger to the health of children and the elderly. If visits to the site were made in the numbers predicted by the applicant – around 3,200 attendances per day – the functionality of that section of the A14 would be seriously undermined with huge implications for the economy of the area.
- c. A proposal of this size cannot reasonably be entertained at any level without giving some prior consideration to the likely infrastructure requirements. Environmental impacts aside, there is a strong possibility that some very basic information on infrastructure issues will make it abundantly clear that the practical and cost implications of development would render it wholly unworkable. If so, local people can be quickly relieved of the worry associated with the repeated re-emergence of the proposals, and those living close to the site can be freed from the resultant blight. To that end, before contemplating including this in the Local Plan as a site for distribution and storage, we recommend that Suffolk Coastal District Council should make preliminary enquiries of Highways England to establish whether the installation of a grade separated junction could be entertained by them within the life of the plan and, indeed, to obtain a ball park figure as to the likely cost of creating such a junction which would certainly be a multi-million pound project. The idea of a rail head to serve the site was also posited by the applicants when they made their scoping opinion request at the end of 2016. That idea has not, as far as we are aware, been discussed with Network Rail, but the £60 million price tag of the

project to create a passing loop on the Felixstowe Branch Line, at least gives some indication of the huge expense. It follows therefore that some simple preliminary checks should also be made with Network Rail.

- d. If the applicant's suggestion of a rail freight interchange is intended to be taken seriously, then consideration must be given to fact that, at 115 hectares, it exceeds the 60 hectares threshold above which a rail freight interchange project falls into the category of "infrastructure projects to be considered nationally significant" as defined within the Planning Act of 2008. These projects are for consideration by the Planning Inspectorate from the outset. It is interesting to note that the project is only a little under half the size of the massive West Midlands interchange project alongside the M6, a factor which will no doubt put the proposals into some sort of context for District Councillors. <http://www.westmidlandsinterchange.co.uk/about-the-project/>

In the light of all the factors listed above, the group urges Suffolk Coastal District Council to reject Innocence Farm as a potential site for port related use.

This is the collective response of the following parish councils:

- ***Bucklesham***
- ***Kirton & Falkenham***
- ***Levington & Stratton Hall***
- ***Trimley St Martin***
- ***Trimley St Mary***

Any questions relating to this document should be directed to the clerk:

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