

LEVINGTON AND STRATTON HALL PARISH COUNCIL

Parish Clerk
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21st March 2020

East Suffolk Council
Planning Department
East Suffolk House Riduna Park
Station Road Melton
Woodbridge

Dear Sirs

Planning Application DC/20/0815/FUL

All residents were made aware of this application by a village wide leaflet drop and a Parish Meeting held on 12 Mar 2020.

The Parish Council strongly opposes this application as being inappropriate, detrimental and dangerous in this location.

The following reasons are given:

1. Joining of Settlements

- a. It is the policy of ESC not to infill and join settlements.

Policy SCLP10.5: Settlement Coalescence

“Development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements”.

It is important to keep the A14/A45 corridor “green” to maintain separation between the urban settlements of Ipswich and Felixstowe.

The PC opposes all development along A14/A45 corridor for this reason.

2. Countryside

The location is “countryside” as defined in the Policies of the Core Strategy of the Local Plan

Policy SCLP3.3: Settlement Boundaries

“New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise.”

There are no specific policies allowing an exception in this case.

The land is “**agricultural**”. The description as ‘derelict’ is irrelevant.

3. Traffic Impacts

The application envisages all lorries arriving and departing via the Levington junction of the A14.

- a. This has very short splays for both exiting and joining the A14 making it very dangerous, for use by slow moving vehicles. (see d ii.)
- b. To avoid this entrance to the A14, lorries will come down Felixstowe Road (among fast moving cars) towards Ipswich and turn right onto A1156 across fast moving traffic – an accident blackspot.
- c. A Business Park and a Sizewell Freight Management Facility are possible major developments near to and using this junction.
- d. Operation Stack
 - i. When Stack is in operation, the westbound exit from the A14 at Levington junction onto Felixstowe Road is closed. To avoid being directed into Stack via Seven Hills, lorries will come down the unsuitable single track road from Trimley.
 - ii. When Stack is ending, the Police stop westbound traffic on the A14 at the Levington junction with a rolling roadblock to let the slow moving lorries out - professional operational evidence that this exit is extremely dangerous for slow moving lorries.

- e. There is no exit across the A14 towards Felixstowe – lorries going to Felixstowe will have to go to Seven hills via A14 or Felixstowe Road. The temptation will be to use the single track road to Trimley.
- f. Lorries coming Eastbound on A14 to the Lorry Park, may well be led through Nacton and Levington by their sat navs (even via single track Stratton Hall Drift). When this happens it causes damage and disruption. (See pictures in Appendix 1)
- g. Felixstowe road is part of national cycle route 51. Its use by large numbers of HGVs would be inconsistent with this designation.

4. Previous application C99/0519, for an agricultural storage building, (not 82 HGVs!) was refused for the above traffic issues and 'countryside' designation. The subsequent increase in traffic volumes underlines the unacceptable traffic dangers.

5. Landscape Impact

- a. Surrounding land is farmland – a fortified fenced compound full of large lorries and with high CCTV and lighting masts will be very alien in this landscape and represent a loss of visual amenity, especially when the lighting is on. (In winter this will be from mid-afternoon).
- b. Pylons and (now redundant) electricity cables currently present are due to be removed following under-grounding of the main power supply between Ipswich & Felixstowe.

NOTE: The landscape pictures presented appear to have been taken with a wider focal length lens than is normally recommended.

6. Operation

It is proposed that the majority of vehicles will leave between 0400 and 0700 and return between 1600 and 1900. This will occasion the worst possible noise problems for the near-by residents, particularly the morning departures waking them earlier than they would choose. It is not clear how this or any more sociable arrangement of flows could be enforced.

As well as these peak activity periods, this will effectively be a 24 hour operation.

Comparison with activity at Walk Farm & the Gunshed is not valid; they are small, 'light' operations. **and have strictly constrained daytime working imposed by planning conditions.**

NB Eastern Structures illegal use of "agricultural" land on the Felixstowe Road is

awaiting enforcement action following refused retrospective 'change of use' application.

7. Noise

It is very obvious that there will be considerable noise generated by the operation, and at unsociable hours.

- a. Movements equate to an average of two lorries/minute departing or arriving during peak times, creating not only noise from the low gear maneuvering of the lorries, but also from slamming of cab doors, reversing alarms and shouted exchanges.
- b. In practice, inevitable queuing congestion will exacerbate noise levels.
- c. Night time 'shunting' will disturb neighbouring residences.
- d. Refrigerated lorries – refrigeration engines need to running all through night. (No mention in the 'Noise' document)
- e. Actual rather than postulated experience - Walk Farm and the two cottages experienced severe noise and disruption (see a. above) when an illegal lorry park operated near Walk Farm.
- f. The supplied 'expert' noise report is flawed. See Appendix 2 for a technical critique.

8. Light Pollution

There can be no question that the development will create light pollution where none currently exists, with the site showing up within a wide area at night. It will be particularly 'present' to local residents. Scant detail is provided.

Development Management policy DM26 Lighting applies.

9. Air pollution

It is unquestionable that each phase in the operation of an HGV engine produces a different level of emissions. The acceleration phase can produce eight times the emission level under cruise conditions. The HGVs that are to use the proposed facility, if it were to be granted planning permission, will be operating in the phases that are high in harmful emissions. This would be the case even if the engines concerned are the latest in terms of reducing emissions.

In the Executive Summary of the Redmore Air quality report it is stated that: "The proposals have the potential to cause air quality impacts as a result of road traffic

exhaust emissions associated with vehicles travelling to and from the site during the operational phase.” The emissions from vehicles travelling to and from the site must be less important than those emissions that would be produced at the proposed site where, at times, the number of vehicles emitting pollutants would be large and would be concentrated at the site. The relationship between the proposed on-site emissions and general releases on the A14 is not the central issue, whereas the local concentration is. This relates back to the earlier point made about noise pollution. There is a clear distinction between the linear source such as the A14 and the point/areal source of the site. It is not clear that this has been adequately taken on board.

Page 10 of the report shows in Table 4 predicted background predictions. NO2 and PM10s are the chosen pollutants. This is surprising since recent and not so recent work has shown that important though PM10s are, smaller size particles such as PM2.5s are of greater relevance as an air quality measure since they penetrate more deeply into the pulmonary system. As in the case of noise, it is surprising that the report has, apparently, not carried out any bench-making. There are sites in the UK that would be suitable and in France many opportunities.

While the report has a lot of ‘busy’ material from general guidelines attention to the local case does not in many cases meet the test of common-sense.

10. Loss of Residential Amenity

Taking the above issues in to account, there will undoubtedly be a significant loss of residential amenity, particularly by the properties immediately adjacent. But also affected will be Heath Cottages on Felixstowe Road, Seabridge Cottages, Long Reach and The Havens on Stratton Hall Drift.

Policy SCLP11.2: Residential Amenity

“Development will not cause an unacceptable loss of amenity to neighbouring or future occupiers of development in the vicinity”.

11. The site is not needed – Inspector’s letter re Local Plan and Innocence Farm:

“Consequently, I consider that the Innocence Farm allocation (SCLP12.35) should be removed from the Plan. Given the provision of employment land otherwise being made, there is no need to provide an alternative site to Innocence Farm.”

Yours sincerely

Angie Buggs
Clerk to Levington and Stratton Hall Parish Council

Appendix 1



Village Hall junction,
Levington



Stuck on Church Lane
(Stratton Hall Drift)



Stratton Hall Drift –
Marina Entrance

Appendix 2

Noise

This section of the Planning Application support documents concludes with a summary which includes the statement that, "the calculations and assessments undertaken within this report indicate that the rating noise level from the facility would fall well below the typical background sound level at the nearest receptor locations during the a.m. peak period, the daytime hours and the evening/overnight period. This would result in a low noise impact in accordance with BS4142:2014".

N.B. BS4142:2014 was modified in 2019 to reflect the unsatisfactory nature of some aspects of the 2014 version.

The report presented does not acknowledge the fact that the Government and its experts do not attach numeric values within either the Noise Policy Statement for England (NPSE) or National Planning Policy Framework (NPPF) for the three levels, No Observed Effect Level, Lowest Observed Adverse Effect Level and Significant Observed Adverse Effect Level. The simple noise level measurements present only a very general guidance to the state of the noise environment at particular locations.

The report presented is a clear example of the serious limitations of BS4142:2014 applied in a formulaic manner to draw conclusions that fit with what the applicant wants rather than the science.

The basis of the above assertion is based on the actual experience of the Walk Farm receptor. The operation of an unauthorised lorry park adjacent to the dwelling resulted in very serious noise pollution. The major factors in the creation of Significantly Adverse Effect Level were, amongst other, the slamming of cab and trailer doors, HGV on tick-over, reversing alarms and shouted exchanges between drivers. All this at any time of day or night. No-one should be subjected to such an environment whatever the balance between background noise and predicted noise on the proposed site. This example makes clear that the combination of simplistic empirical work and the general modelling are not able to provide a clear picture of the damage the proposed site will deliver.

The noise report fails to address the significant role of wind direction and force in determining the area and extent that will be affected by the 'new' noise source. Local residents are well aware of this and the noise researcher needed only to talk to them. It is worth also noting that during the periods of maximum vehicle movement to and from the lorry park the noise will be almost continuous, whereas the 'typical background' level is not continuous but periodic as for example when a train passes, or the sound of a lorry from the A14 when the wind is in a particular direction.

The sample period of two days for the noise study is too small to be truly representative of real-world conditions and to support any conclusions.

RAF Wattisham is identified in the report as being a suitable source of meteorological data for the site since it is likely to be similar to the site. This is not a reliable assumption. Study of its data reveals that local meso-meteorological phenomena such as for example when the sea breeze front occurs, and there are at times clear differences between the site and Wattisham.

There is reference in the report to the rather arcane work of Monin-Obukhow but this and other later stability measures seem to deflect attention from the basic consideration of wind direction and wind speed at the site.

The noise generated by HGVs on the A14 is, in major respects, different from the likely noise at the proposed site. There will be significant differences between the two in terms of tonal values and the report does not address this. Nor does it consider the noise likely to be generated by a large fraction of the 85 HGVs on tick over or moving around the proposed compound at low engine revs with reversing warning sirens.

The proposed lorry park should be considered as a powerful point-source generator of noise not a linear generator as in the case of the A14. Though the use of logarithmic scales complicates the bringing together of multiple sound sources, the two sources, background noise and proposed site forecasts are likely to be additive.

It would have been sensible to identify some sites for bench-marking purposes. For example, last week 30-40 lorry parks were inspected from a distance and not a single one had vehicles parked at right angles to the road entrance. All were at an angle of around 35deg on forward entry to their slot.