

LEVINGTON AND STRATTON HALL PARISH COUNCIL

Parish Clerk
Mrs Angie Buggs
27 Brendon Drive
Rushmere St Andrew
IPSWICH IP5 1N
Suffolk

7th September 2023

Natalie Webb
Planning Officer
East Suffolk Council
Station Road
Melton WOODBRIDGE IP12 1RT

Dear Natalie

Planning Application DC/23/2930/OUT

The planning application which has been applied for is on countryside land and is contrary to Policy SCLP 3.3 Settlement Boundaries

“New residential, employment and town centre development will not be and is not in the Local Plan identified for 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**”.

This parcel of land is not in the Local Plan for development.

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

The Parish Council **objects** to this planning application for the following reasons:

Coalescence

If this planned development was to go ahead it would be adding to the joining of Felixstowe and Ipswich which is contrary to the East Suffolk Council Planning Policy SCLP 10.5 of the Local Plan.

East Suffolk Council has always stated a separation should be maintained between the urban areas of Ipswich and Felixstowe and coalescence of settlements is contrary to this statement and policy.

This area, along with its immediate neighbours, needs to be preserved to maintain the fragile remaining agricultural separate between urban sprawls of Ipswich and Felixstowe.

Location - Visual Intrusion

The proposed site is on an open natural plateau with uninterrupted views in all directions. Any development would be completely out of character for this countryside environment with three immediate residents. This is contrary to SCLP 10.4 Landscape Character, Economic Development in Rural Area SCLP 4.5, and Residential Amenity SCLP 11.

The site is on the gateway to the AONB and specially protected areas. Part IV, Section 85, of the Countryside and Rights of Way Act 2000 sets out the Duty of Regard. This clearly states that it is “applicable to land outside as well as within the AONB” with “the requirement to ‘conserve and enhance’”. As the proposed development will be directly adjacent to one of the few accesses to the AONB, it will certainly not ‘conserve and enhance’ the naturalness of the area.

The current reference to scrub land is totally immaterial as it is designated agricultural land.

Any development in this locality would be out of character with the surrounding land which is countryside.

Noise

There are several properties in close proximity to the land which will be adversely affected. An application such as this will be a 24-hour operation and so will undoubtedly cause a disturbance as there will be lorry movements in the early hours, reversing noise as they are shunting, coupling up to trailers with low gear changes, slamming of cab doors, voices, also any refrigerated lorries will need to keep their engines running 24/7.

It does not state the hours the café will be open.

There is also a proposed maintenance area which will be a workshop with additional noise of power tools and general mechanical noise. In practice, inevitable queuing congestion will exacerbate noise levels.

Light Pollution

The proposed development will have security lightings and owing to the large area of the site these are to be mounted high upon poles not only lighting up the site but also the surrounding area causing a disturbance to local residents and the wider area. The plan does not show clearly the intended lighting in detail.

All night lighting in this flat and dark countryside will not only be an inappropriate intrusion on the landscape but a permanent imposition on the nearby properties.

Development Management Policy DM27 Lighting applies to this development.

Air Pollution

There will be a large amount of air pollution caused by the lorries running engines as they manoeuvre into the bays as stated before and refrigerated lorries running 24/7. During the winter months many lorries run diesel heaters to warm the cabs and a large number of these running in a

small area would cause more air pollution, alternatively some may run small generators although these may be quiet several running in a small area where it is open will be adding to the noise and emission levels.

From the café there will be cooking smells and additional pollution.

Residential houses are very nearby, and the residents should not be subjected to these pollutants. East Suffolk Planning Policy SCLP 11.2 Residential Amenity which states “all proposals should seek to ensure that they safeguard the amenity of both existing residents and future residents, both within existing buildings and from the proposed development.

Traffic

The site is adjacent to a busy 60 mph road (old A45) and it is also part of the Route 51 cycle route which is regularly used by cyclists.

There are bus stops on either side of the road in close proximity to the ingress and egress of the proposed site. These bus stops are frequently used by visitors to the Marina amongst others, pedestrians have to cross this already busy road to access the east bound bus stop but with the additional lorries turning in and out it will become more dangerous for pedestrians as there is no footpath.

The proposed ingress and egress is close to a sharp bend which leads on and off the A14. The slip road for lorries to access the A14 is very short/non existent meaning lorries will be pulling out onto a fast-moving road from a standing position.

The other option is for lorries to use the old Felixstowe Road heading west and then turn right across another 60-mph road to Seven Hills junction which is an accident blackspot, before joining the A14 east bound towards the docks. With the Sizewell C development Freight Management Facility also using this route it is going to become increasingly busy.

In the past lorries, have tried using the single-track road past Moston Hall and not the Trimleys, which leads into a residential area with a large number of recently built new houses. Many of the houses on the High Road have no off-road parking so there are always cars parked on the road. In the past this has caused chaos on this narrow road with verges churned up and signs damaged.

Frequently, the A14 is closed around the Orwell Bridge through accident or incident on the bridge itself. Lorries will then attempt to exit or access the site via the single track ‘Quiet Lane’ of Stratton Hall Drift with its lack of formal passing places and its unnavigable ‘Z’ bend. There is Police and media evidence to substantiate this fact.

Although the application is for 69 lorries and 18 staff spaces it does not take into account the extra vehicles which will be making deliveries to the café, office and workshop area, and refuse collection.

Environment

The proposal does not meet criteria to be supported under SCLP 4.5 Economic Development in Rural Areas of the Local Plan which states development can only be supported outside settlement boundaries, if it avoids or adequately mitigates any adverse impact on the character of the surrounding area and landscape, the AONB and it’s setting or the natural or historic environment.

The site is adjacent to AONB and is agricultural land not scrub land as described in the application.

Views of this site and the gateway to the AONB would be significantly changed. More importantly it is also very close to a site which nightingales use for nesting and have done so for a high number of years. Nightingale numbers have declined by 90% in the last 50 years due to loss of habitat. They are on the red list for endangered birds. In the Suffolk Wildlife letter to East Suffolk Council dated 1st September 2023 in which they recommend a holding objection made the following comments:-

“We have read the ecological survey report (Eco-Planning UK 2023) and believe that several elements of a high standard report are missing. Therefore, the report does not adhere to CIEEM Guidelines for Preliminary Ecological Appraisals and is in our opinion currently not suitable to support a planning application. ...nightingales are a species of conservation concern. Upon assessing the PEA report provided by the applicant we are disappointed to see that the ecology report has no consideration for birds.

The assessment of the site does not clearly define the habitats present nor the plant species which defines those habitats. ...The PEA notes no priority habitats are present onsite. However, there appears potential for a hedgerow to be present along the north east boundary of the site which may meet the criteria for a priority habitat. Suffolk Wildlife Trust welcomes clarity on this, as the hedgerow could be impacted by proposed access to the site....”

In the biodiversity and conservation questions the applicant has answered ‘No’ to any protected and priority species on adjacent land.

The plans state that the site will be connected to the mains sewerage system that runs along the old Felixstowe Road. Clarification would be needed on this as the properties close to this site and the road are all on septic tanks. Is there an existing mains sewerage along there?

There does not seem to be any information on the plan regarding drainage of surface water. The site sits slightly low of the road, which naturally drains on to the site. The agricultural land the other side of the railway line could be at risk of flooding through the existing culvert which runs under the line at the east end of the lowest point of the site. The site will become a large area of hardstanding and with no natural drainage, which the current agricultural land currently enjoys. The water run-off could also cause erosion or other damage to the rail embankment.

Archaeology

There is a submission letter by Dr Hannah Cutler relating to known and still to be discovered archaeology in the area of this planning application. The Parish Council supports this view as being high archaeological potential.

The Levington Bronze Age Hoard (now in Ipswich Museum) was discovered in ground near this application in the 1960s. There are also Iron Age round houses next to the railway line and within yards of this proposed lorry park.

In October 2016 archaeological excavation work was undertaken as a requirement before laying underground electricity cables alongside the railway line in Levington and Stratton Hall. The project gave a transect through the parish archaeological landscape investigating prehistoric Roman and Medieval sites that have been identified through cropmarks and systematic evaluation trenching.

The Parish Council request that the applicant should be required to provide a full archaeological evaluation of the site prior to any determination of this planning application. This would allow for the preservation in situ of any sites of national importance that might be found.

Security

Concerns have been raised by local businesses and residents about drivers wandering off site and onto private property as was the case when the illegal lorry park was operational from Walk Farm.

Although the application states there is a need for lorry drivers to have somewhere to park up and use amenities this is contradictory to the Port of Felixstowe 10-year Plan which states that with the £40 million improved rail terminal and work on the line to Felixstowe Port already undertaken they will hope to remove 500,000 lorries from the road. This important rail development is of national significance and was co funded by the European Union TEN-T programme.

Operation Stack has not been used for at least two years even through high winds, so the proposed amenities for lorry drivers caught up in the stack system is unnecessary. The stack area also stops before the entrance to the lorry park.

The Innocence Farm Development was turned down by Government Planning Inspector and was to be removed from the Local Plan as not needed nor was any alternative site needed.

As stated at the beginning of this letter Levington and Stratton Hall Parish Council **strongly objects** to this planning application.

Kind regards

Angie

Angie Buggs
Clerk to Levington and Stratton Hall Parish Council