

Levington and Stratton Hall Parish Council

Planning Application Details:

Planning consultation - DC/20/0815/FUL | Construction of a lorry park comprising 82 lorry parking spaces, a covered maintenance bay, two storey office accommodation, a single story driver's mess, 13 car parking spaces, 1 disabled car parking space, motorcycle parking, bicycle parking, a new site ingress from and a new site egress on to Felixstowe Road, security fencing, CCTV and site lighting. | Land South Of Felixstowe Road Stratton Hall Suffolk

Comments to be received by East Suffolk Planning Dept by: 24th March 2020

Parish Council Planning Meeting Details (if appropriate):

Parish Council Comments:

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 PM_{2.5}s 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.”

Outcome: Withdrawn by applicant.