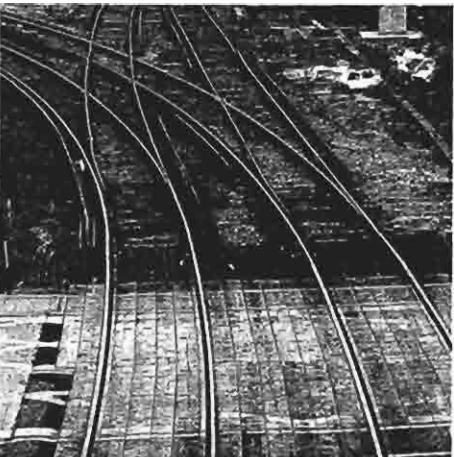
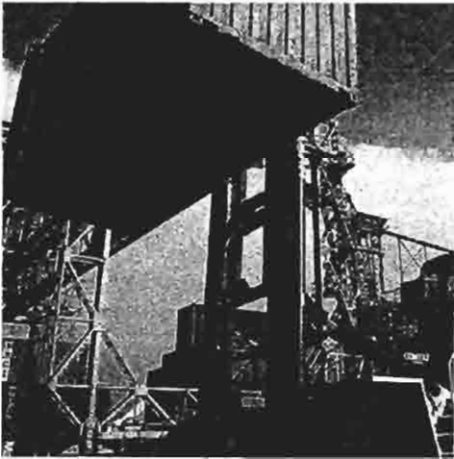


# Stowmarket Multi-Modal Distribution Park

Planning Statement  
May 2007

MID SUFFOLK DISTRICT COUNCIL RECEIVED 18 MAY 2007 PLANNING CONTROL AND BUILDING CONTROL Acknowledged by .....
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**BIDWELLS**

## **1. INTRODUCTION**

**1.1** This Planning Statement has been prepared by Bidwells on behalf of SMMDP Limited to accompany an outline planning application for the development of a multi-modal distribution park on land adjacent to the A1120 Creeting St Peter, to the south-east of Stowmarket.

**1.2** This statement considers the planning policy issues raised by the proposal. The purpose of this statement is to provide supporting information and analysis. It should be read in conjunction with the following documents:

- Design and Access Statement
- Transport Assessment
- Flood Risk Assessment
- Ground Conditions: Initial Assessment

**1.3** In addition to the above documents, Bidwells has undertaken a full Environmental Impact Assessment (EIA), the findings of which are reported in the Environmental Statement (ES) that accompanies this application. The ES includes a non-technical summary.

## **2. BACKGROUND**

**2.1** The UK economy is heavily dependent upon international trade in manufactured and semi-manufactured goods. This trade is already dominated by the container system. As the UK economy expands, the level of containerised imported and exported goods will continue to increase. The UK ports are an essential part of the transport infrastructure on which the UK economy and many businesses depend. The importance of ports, and associated distribution hubs, to the UK economy, cannot be overstated. Currently around 95% of imported and exported goods by volume go through UK ports.

**2.2** As well as handling the import and export of goods directly into and out of the country, a port can act as a gateway or a hub for the transshipment of goods or as a place for the processing of products before they reach their final destination. It is therefore, against this national economic backdrop, and the need to provide support facilities or a hub within the hinterland to the haven ports of Felixstowe and Harwich, that the proposals for the establishment of a multi-modal distribution park at Stowmarket have emerged.

### **Sub-Regional Context**

**2.3** The strategic location of the site adjacent to the Great Eastern Mainline and the A14 trunk road provides an ideal opportunity for the establishment of a multi-modal distribution park to serve the needs of the Haven Gateway Sub-Region.

**2.4** The Haven Gateway Sub-Region covers an area of about 1200 square kilometres of north-east Essex and south-east Suffolk. It has a population of over 500,000 and has seen significant growth. The sub-region has two major towns, Ipswich and Colchester. The remainder of the sub-region is predominantly rural in character.

**2.5** Historically the economy of the sub-region has relied on farming and farm machinery, and port related activities but grew rapidly when insurance companies set up service and underwriting centres in Ipswich and Colchester in the early 1970's. British Telecom set up its main research centre on the outskirts of Ipswich at the same time. Since then the economy of the sub-region has flourished. Approval has been given recently for a major extension to the container handling facilities at Felixstowe, and similar proposals exist for Bathside Bay, Harwich.

### **Site and Surroundings**

**2.6** The site is located to the south-east of Stowmarket and comprises open agricultural land that extends to approximately 45.3 hectares (112 acres).

**2.7** The site is bounded to the north and east by Mill Lane which provides access to the village of Creting St Peter. The A14 trunk road is approximately 300 metres from the northern boundary. The eastern boundary of the site within the vicinity of Clamps Farm is largely undefined.

**2.8** The south eastern portion of the site is low lying and traversed with several drainage ditches. The southern-most boundary adjoins the River Gipping. To the south-west the site is adjoined by the railway line and to the north-west by the A1120 dual carriageway.

**2.9** The site slopes gently from north to south and there is a small wooded area along the southern boundary adjacent to the railway embankment. A high voltage overhead line traverses the site in a north-south direction. The location of the site is shown on Figure PS 1 below.



**Stowmarket Multi-modal  
PS Figure 1 Location Plan**

Drawing no. CY77400001-38 Date Apr 2007 Client  
Revision Checked by Drawn by CWF Scale 1:2500 @ A1 OS Licence number 100020449

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**BIDWELLS**

**2.10** The application description is "Use of land and construction of buildings and hardstanding for storage, distribution and general industrial (B2) uses, with associated rail sidings, structural planting, flood compensation, surface water storage areas and means of access".

### The Proposals

**2.11** The intention is to create a modern distribution park that takes advantage of the strategic location of the site adjacent to the A14 trunk road and the Great Eastern Mainline. The proposal would involve the construction of hardstanding, warehouse and general industrial facilities for the storage and processing of goods and their transhipment by road and rail.

**2.12** The application is accompanied by an indicative Master Plan which illustrates how the site might be developed. This indicates the possible construction of approximately 120,000 m<sup>2</sup> of floor space in five buildings ranging from 6 to 7.5 metres to 12 to 15 metres in height, plus the formation of rail sidings and container storage areas. Extensive structural planting is proposed. In addition flood compensation, and surface water attenuation areas are to be formed. The extent of the indicative proposal is summarised in Table 2.1 below and forms the basis of assessments detailed in the Environmental Statement, Transport Assessment and Flood Risk Assessment.

Table 2.1: Proposed Development

Development Plot	Land Use	Floor space/area (sq metres)	Building Height (metres)
1	General Industrial	8,000	6 - 7.5
2	Warehousing	13,750	12 -15
3	Warehousing	10,000	12 -15
4	Warehousing	27,850	12 -15
5	Warehousing	60,386	12 - 15
-	Rail Sidings	43,560	
-	HGV parking and container storage	79,800	
-	Car parking	27,500	
-	Strategic Landscaping	52,154	
-	Flood Storage Area	115,000	
-	Surface Water Attenuation	15,000	

## Background

**2.13** The means of access from the A1120 is to be considered as part of the application, but the design, siting and appearance of the individual buildings, and the structural and plot specific landscaping are reserved for subsequent approval along with the precise layout of the railway sidings. An indicative block plan has, however, been produced to show how the proposed development is to be achieved. This is reproduced as Figure PS 2 below.



**2.14** The proposed development would be well related to the existing built-up area and provide additional employment opportunities for people in Stowmarket and the surrounding villages. The location of the site adjacent to the built-up area will afford access by foot, bicycle, and public transport.

**2.15** It is anticipated that the development may take up to five years to complete, depending upon market conditions, following the receipt of planning permission. Once the development is complete it is envisaged that rail-based container traffic would enter the site from the ports on a daily basis, and for loads to be broken-up or reprocessed on-site. Lorries would also bring containers from the ports via the A14 trunk road. Goods would then either leave on the rail network via the 'cross country' route to the Midlands or back onto the Great Eastern Mainline towards London. Alternatively they may travel by road via the A14.

**2.16** The gauge of the rail network that would serve the distribution park is acceptable for the movement of containers, or will be made so in the very near future. In particular the Great Eastern Mainline and the route via London to the West Coast Mainline are at the appropriate gauge to take all container types. The 'cross country' route to Nuneaton where it meets the West Coast Mainline is currently at a smaller gauge. Until such time as the Felixstowe to Nuneaton route is upgraded the site will perform an important function allowing the transfer of freight either to or from large containers that are travelling to or from the west. Even when the line is upgraded it is anticipated that this function will continue.

### Planning History

**2.17** In March 2003 an outline planning application was submitted for a rail served transshipment depot with a warehouse of 50,000 m<sup>2</sup> and ancillary development to include buildings for packaging, maintenance and offices. The planning application was subsequently withdrawn in November 2004.

### Development Need

**2.18** The multi-modal distribution park proposal is being brought forward in response to growth in the movement of goods through the Haven Gateway ports and the need for additional rail freight handling facilities. The Haven Gateway ports have a key role in the regional, national and international movement of freight and the economy generally. Felixstowe is currently the second largest deep-sea container port in Britain and in 2002 handled 48% of the container traffic. It is now set to undergo considerable growth with proposals for the redevelopment and reconfiguration of the Landguard Terminal and adjacent areas to provide additional deep water berths and container handling capacity having been approved in 2005. This will substantially increase the freight traffic passing through Felixstowe from 3.15 million TEU's per annum in 2002 to 5.6 million TEU's<sup>1</sup> per annum in 2014.

**2.19** The Regional Economic Strategy (RES) for the East of England (2004) includes as one of its goals the need to make the most from the development of international gateways and national and regional transport corridors of which the gateways to the sea are one of those listed. As part of its strategy for achieving this goal, the document sets out a number of key action points which include:

- "Develop the potential of ports and their surrounding areas for job growth and business opportunities, through, for example, skills training and the provision of business infrastructure;
- Support sustainable port expansion proposals and port-related developments that enhance local regeneration projects;
- Develop enhanced access to ports, in tandem with port expansion plans, and increase the proportion of freight travelling by rail with particular emphasis on rail freight interchanges and the Haven Gateway-Nuneaton rail freight route;
- Support appropriate reassessment of regional and sub-regional transport investment plans such as London Gateway and Bathside Bay."

<sup>1</sup> TEU - Twenty foot equivalent units is the standard global measure used for containers.

**2.20** The RES goes on to set out the need to promote the delivery of strategic road, rail and other public transport priorities for the region and notes that the region needs to reduce congestion in transport routes that fulfil a major national or regional role and that better east west links are needed to help to create a wider choice of viable locations and therefore greater flexibility for business. In particular, it identifies the need for better connectivity between different modes of travel. Investment in the region's major interchange facilities is fundamental to the development of the region's transport infrastructure.

**2.21** Currently, the vast majority of freight movement both through and around the region and nationally is by road (88%). This is a major source of road congestion and is also detrimental to the environment due to the resultant emissions. To support the national objective of increasing the proportion of freight transported by rail and water there is a need for interchange locations and facilities where transfer to and from rail and water can take place. The site at Stowmarket represents one such opportunity to develop a road and rail interchange and would meet national and regional objectives in relation to the Haven Gateway.

**2.22** This position is supported by the Regional Spatial Strategy (RSS) which emphasises the important role the ports play in both the transport network and the national and regional economy as gateways for the transportation of goods. Policies T10 and T11 of the Secretary of State's Proposed Changes to the East of England Plan both provide significant support to proposals which provide enhanced opportunities for the efficient, sustainable movement of freight to and from the region's ports.

**2.23** Specifically, Policy T10 states that priority should be given to the efficient and sustainable movement of freight and in particular seeks to increase the proportion of the region's freight carried on rail and by water and that high priority will be given to measures to provide adequate rail freight capability and capacity on routes leading to the region's major ports including Felixstowe.

**2.24** Policy T11 of the draft revision to the RSS requires that access to the region's ports should be managed and enhanced to support their development such that they contribute to national and regional objectives for economic development and growth and regeneration. In this context, the need to maximise the proportion of freight travelling to destinations beyond the region by modes other than road is identified as a key priority.

**2.25** In addition, Policy HG3 identifies the strategic transport infrastructure and services to and from the Haven Ports as a priority for transport in the sub-region. The RSS notes the impact of the Haven Ports on the sub-region's transport infrastructure and confirms that minimising the impact of that movement of freight on the sub-regional and local networks is critical to allow those networks to serve the demand created by locally focussed developments in the main urban areas.

## **Alternative Sites**

**2.26** The choice of location for the proposed development has been driven by the need for the site to meet a number of essential criteria which are necessary to satisfy the needs of the distribution businesses which would ultimately occupy the warehouse units within the proposed development. These criteria included a site that:

- was located within the Newmarket – Felixstowe corridor;
- was in close proximity to or had direct access to the A14;
- adjoined the Great Eastern Mainline with access to the Midlands;
- provided an opportunity to create a dedicated railway siding; and,
- had space to accommodate 120,000 m<sup>2</sup> of floor space.

**2.27** These essential criteria cannot be compromised without undermining the effectiveness and attractiveness of the development to prospective occupiers and its ability to address the policy objectives within the RSS. As such, these are relevant to the identification and consideration of alternative sites.

**2.28** In considering alternative locations to accommodate the proposed development existing and proposed strategic employment sites along the A14 corridor between Newmarket and Felixstowe have been identified. These include:

- Land at Saxham Business Park, Saxham, – St Edmundsbury;
- Land at Great Blakenham – Mid Suffolk;
- Former Sugar Beet, Sproughton, Ipswich – Babergh;
- TXU Site, Whersted, Ipswich – Babergh;
- Ransoms Europark – Ipswich/Suffolk Coastal;
- Blofield Business Park, Felixstowe – Suffolk Coastal.

**2.29** The relative merits of these sites are discussed in detail in the Environmental Statement, but in summary of the sites identified, only three, the Saxham Business Park, the former Sugar Beet Factory, Sproughton and the Blofield Business Park are located adjacent to railway lines such that there would be potential for dedicated railway sidings to serve the proposed development. In each case however, there is insufficient land available to satisfactorily accommodate the scale of development proposed, even taking a reasonably flexible approach. As a consequence it has been concluded that there are no suitable sites available to accommodate development of the amount proposed in Stowmarket within the search area.

**2.30** A multi-modal distribution park on the application site represents a logical place for the development of facilities that would underpin the role of the ports and provide additional employment opportunities. It would also be located to the west of the heavily congested Orwell Bridge.

### 3. PLANNING POLICY CONSIDERATIONS

**3.1** PPS1, Delivering Sustainable Development (2005) provides overarching advice and states that the Government is committed to promoting a strong, stable and productive economy that aims to bring jobs and prosperity for all. It encourages local planning authorities to recognise the wider sub-regional, regional or national benefits of economic development and to ensure that suitable locations are available for industrial and commercial development so the economy can prosper.

**3.2** PPG4, Industrial and Commercial Development and Small Firms (1992) provides guidance on the range of issues relating to industrial and commercial development. Although PPG4 is now somewhat dated, the guidance seeks to encourage new development in locations which minimise the length and number of trips, especially by motor vehicle, and encourage the use of public transport. PPG4 goes on to indicate that well-planned distribution parks should be located wherever possible where they are capable of access by rail and water transport.

**3.3** PPG13, Transport (2001) includes more detailed planning policy guidance for freight. It outlines the Government's policy support for the movement of freight by rail. It requires local planning authorities to be proactive in planning for rail freight and major freight interchanges. PPG13 recognises that the land use planning system can help to promote sustainable distribution, including the movement of freight by rail. In preparing development plans and in carrying out their development control function, local authorities are required to:

- Identify and, where appropriate, protect sites and routes (both existing and potential) which could be critical in developing infrastructure for the movement of freight, including interchanges and facilities allowing road to rail transfer. Planning authorities should also ensure that any disused transport sites and routes are not unnecessarily severed by new development or transport infrastructure. In relation to rail use, the identification and protection of sites and routes should be carried out in liaison with the Strategic Rail Authority which is recognised as being best placed to advise on factors which are important in delivering wider transport objectives;
- Where possible, locate development generating substantial freight movements such as distribution and warehousing away from congested central areas, residential areas and ensure adequate access to trunk roads;
- Promote opportunities for freight generating development to be served by rail by influencing the location of developments and by identifying and, where appropriate, protecting realistic opportunities for rail connections to existing manufacturing, distribution and warehousing sites adjacent or close to the rail network; and
- On disused transport sites, authorities should consider uses related to sustainable transport before other uses.

**3.4** The Government published 'A Guide to Better Practice' to support PPG13. It provides practical guidance on the implementation of the PPG and on the land-use and transport planning systems to achieve a reduction in the need to travel. In terms of freight, the Guide advises that the movement of freight is an important consideration in reducing the need to travel. It also recognises the operational advantages of road over rail and the consequential likelihood that road haulage will continue to dominate domestic and international freight markets for the foreseeable future. However, where it is possible the movement of freight by other options, including rail, should be encouraged.

**3.5** Its advice in respect of warehousing, distribution and industrial activities is that they should be located adjacent to key highway links and to main rail/water links. Such locations would facilitate the movement of freight by rail and allow the inter-modal movement of goods from road to rail.

**3.6** “Modern Ports: A UK Policy” sets out the Government’s broad policy aims for UK ports. It recognises the contribution that shipping makes to sustainable transport and that the national interest extends to the UK’s ports remaining able to handle current UK trade and its development efficiently and in a sustainable way. It accepts that port operators must succeed not only in meeting the immediate demands of their customers, but also in investing in new facilities. The policy emphasises the importance of making the best use of existing port infrastructure. It therefore follows that proposals for the expansion and improvement of existing ports, and the provision of facilities within their hinterland should be afforded appropriate support in the national interest.

**3.7** Indeed local authorities are required by the policy to promote the role of the ports in sustainable distribution, and also promote viable interchange facilities to support ports (Para. 2.5.11). It is a stated national policy objective to improve access to ports by forms of transport other than road vehicles. The future development of the ports themselves, may well depend on the opportunities for accessing them by more sustainable transport means, other than roads. The policy recognises that port development will bring with it need for commercial development and transport infrastructure, and that it is for the land use planning system to balance port improvement, expansion and accessibility needs against social and environmental impacts

## **Regional Policies**

### *Regional Economic Strategy*

**3.8** In 2004, the East of England Development Agency (EEDA) and East of England Regional Assembly (EERA) published ‘A Shared Vision: The regional economic strategy for the East of England’. This Regional Economic Strategy (RES) sets out the key economic objectives for the region.

**3.9** Of particular relevance is Goal Six, which is “making the most from the development of international gateways and national and regional transport corridors”. In particular, the RES seeks to “develop the potential of ports and their surrounding areas for job growth and business opportunities” and to “develop enhanced access to ports, in tandem with port expansion plans, and increase the proportion of freight travelling by rail with particular emphasis of rail freight interchanges”. The proposals for the site are wholly consistent with the strategic ambitions of the RES, in supporting the growth of the ports, and in making sustainable use of transport resources.

### *Regional Planning Guidance for East Anglia to 2016 (RPG6)*

**3.10** RPG6 sets the regional context within which development plans are produced to 2016. The thrust of the document has been to guide development proposals expected in the region so as to sustain its distinctive environment while meeting social and economic objectives.

**3.11** RPG6 notes the role of the A14 trunk road within the Trans European Network and as such supports improvements to the A14. RPG6 also notes the exceptional port infrastructure of East Anglia and in particular the Port of Felixstowe and as such supports rail improvements to ensure the sustainable management of transport resources at the port. A multi-modal distribution park at Stowmarket would help to support the sustainable use of transport resources at the port, while providing local employment opportunities.

*Draft Regional Spatial Strategy for the East of England (RSS14)*

**3.12** The Draft Regional Spatial Strategy (RSS) contains a specific sub-regional strategy for south-east Suffolk and north-east Essex. The Haven Gateway Sub-Region consists of a number of districts, including Mid Suffolk, and has been highlighted as having the potential for further significant economic development and growth. Policy HG1 provides for 20,000 additional dwellings, including some 4,600 on the fringes of Ipswich, in the districts of Babergh, Mid Suffolk and Suffolk Coastal. Policy HG2 goes on to suggest that Local Development Documents will make provision for not less than 50,000 additional jobs in the sub-region by supporting the appropriate expansion of the ports and related activities.

**3.13** The RSS has been subject to an Examination in Public (EIP) and the report produced by the Panel acknowledges that the employment growth targets for the Haven Gateway sub-region between 2001 and 2021 are challenging. The report considers, however, that they are achievable given the potential for growth arising from port development and the buoyancy of the two main urban areas of Ipswich and Colchester. Indeed the ports of Felixstowe and Harwich are clearly of strategic importance for the region and their growth is a key element for the future of the Haven Gateway.

**Local Policies**

**3.14** The Development Plan for the area comprises the Suffolk Structure Plan, 2001, and the Mid Suffolk Local Plan, 1998. In accordance with the Planning and Compulsory Purchase Act, 2004, the Regional Spatial Strategy (RSS) will take precedence when it is adopted as it will be the most recent development plan document.

**3.15** The Mid Suffolk District Council is currently producing a Local Development Framework (LDF) that will replace the existing Local Plan. The Mid-Suffolk LDF is at its very early stages of production. The core strategy's final issues and options consultation ended in February 2007. There are as yet no formal preferred options published relating to freight and distribution interchanges, although the issues and options paper referred to the need to encourage alternatives for freight movement other than using roads.

*Economic Development*

**3.16** Structure Plan Policy CS2 is supportive of proposals that aim to strengthen the economy and encourage employment throughout Suffolk. While major employment development is anticipated in Ipswich, Bury St Edmunds and Lowestoft, further significant employment development is anticipated in Stowmarket, Sudbury and Haverhill. The proposed development of the site would therefore be consistent with this overall strategic planning objective.

**3.17** Structure Plan Policy ECON2 provides more specific guidance on the location of new employment development and requires it to be located in or adjoining towns. In all cases sites should have good access to the primary route network, be easily accessible by means other than the private car or lorry, be well related to major housing areas, and contribute to a mix of uses in large development areas where possible.

**3.18** In this instance the proximity of the site to the A14 trunk road and the A1120 would satisfy the first criteria provided by the policy. It is well related to the built-up area and access would be available by foot, bicycle and public transport services. As such the development would help to secure a mix of land uses and extend the range of employment opportunities available in Stowmarket and the surrounding area.

**3.19** As far as warehousing, haulage depots and container compounds are concerned, Structure Plan Policy ECON6 provides that proposals will only be acceptable on sites with good access to the road network and the railways, providing there is no conflict with policies for the protection of the environment. As the supporting text to the policy indicates, good access to the primary route network means vehicles should be within a short distance of the main road without causing material damage to the built or natural environment or creating safety hazards.

**3.20** Similar provisions exist within the Local Plan and Policy E3 indicates that proposals for warehousing and haulage depots will be considered on their merits with special regard to their relationship with the primary route network.

### *Transport*

**3.21** Structure Plan Policy T6 provides support for a shift of road-borne freight to rail and requires local authorities to include within their local plans proposals for additional depots to meet new demands, and to replace existing inappropriately located facilities. Where suitable sites cannot be found within existing settlements the policy provides that sites may be developed outside built-up areas. As the supporting text points out, efficient movement of freight is an essential requirement if the economy is to prosper and the development of sites for both rail-to-road and road-to-road transfers will be encouraged. The strategic location of the site adjacent to the Great Eastern Mainline and the A14 trunk road therefore provides an ideal opportunity for the establishment of a distribution park to serve the needs of the Haven Gateway sub-region.

**3.22** Structure Plan Policy CS10 goes on to state that there should be an integrated approach to development and transport by ensuring that new development is located and designed to minimise the need for travel and reduce the demand for lorry and private vehicle use. In this instance the location of the application site on the edge of Stowmarket, and in close proximity to the main built-up areas, would afford access by foot, bicycle, and public transport. In addition the provision of a rail sidings area would reduce lorry use. The proposal would therefore be consistent with national planning objectives in relation to sustainable development.

### *Natural Resources*

**3.23** Structure Plan Policy ENV4 states that the quality and character of the countryside will be protected for its own sake and conserved. It goes on to state that development that is not required in connection with agriculture and forestry will only be acceptable where there is an overriding case and the local authority is satisfied that it minimises its impact on the environment. Local Plan Policy CL1 is similar in intent. Structure Plan Policy ENV16 goes on to afford protection to high quality agricultural land, as does Local Plan Policy CL11. The site is currently in agricultural use and is classified as Grade 3 land.

**3.24** The Environmental Statement that accompanies the planning application demonstrates that the proposal would have a limited impact upon the surrounding countryside to the north and west of the site. The impact to the south and south-west is likely to extend to 1 to 1.5 kilometres and to the east to 1 kilometre. While this impact has been judged to be of medium significance, mitigation planting is proposed. Although this will not totally screen the site, it will have a very important role in filtering and screening views. In the longer term the planting would bring benefits that would reduce any adverse impacts. The proposed mitigation measures would, therefore, minimise the impact of the development upon the surrounding countryside.

**3.25** In view of the above the proposal would not unduly conflict with the provisions of development plan policies that are intended to protect the countryside and the character of the landscape. Furthermore it would not result in the loss of Grade 1 or 2 agricultural land.

### *Archaeology and Built Heritage*

**3.26** Although the application site does not fall within any areas of recognised archaeological potential, the magnitude of the development is such that an archaeological assessment is required. An archaeological assessment has therefore been undertaken. This assessment concludes that the proposed development lies within an area of archaeological potential although the presence or absence of remains is unknown. The exception to this is the area within the flood plain where there may be remains and the site of an explosive works dating from World War 1 where no physical remains were identified.

**3.27** In order to mitigate any adverse impacts it is proposed that a programme of archaeological works is carried out to preserve, either in situ or by record, any remains that might be present prior to development. Such an approach would be consistent with national planning policy guidance and Development Plan policies. In the circumstances there would be no obvious conflict with the provisions of Structure Plan Policy ENV22 or Local Plan Policy HB14. Both policies are similar in intent and require that archaeological remains are either preserved in situ or recorded as appropriate.

**3.28** There are three Listed Buildings within the vicinity of the application site. These are Bradley Mill House, Badley, which is located on Stowmarket Road to the south, The Clamp, Mill Lane, Creeting St Peter, and 1 and 2 Clamp Cottages, Mill Lane, Creeting St Peter.

**3.29** Bradley Mill House is a Grade II Listed Building that dates from the C17 with subsequent C18 and C19 alterations. It is of single storey construction with attics and is timber framed and plastered on a plinth of tarred red bricks. The Clamp is also a Grade II Listed Building that dates from the C17 and C18. It is constructed of gault brick with a hipped slate roof and is two-storeys high with attics. The former farmhouse, now 1 and 2 Clamp Cottages, dates from the mid to late C17 and has C19 and C20 alterations. It is also is a Grade II Listed Building.

**3.30** The proposed buildings have been carefully sited to minimise the potential impact of the development upon the setting of these buildings and appropriate structural planting is envisaged. As a result no obvious conflict would exist with the provisions of Structure Plan Policy ENV1 which seeks to ensure that new development within the vicinity of Listed Buildings is in harmony with their surroundings or Local Plan Policy HB1 which is similar in intent.

#### *Ecology*

**3.31** Structure Plan Policy ENV19 states that development will not be acceptable if it has a material impact upon important habitats. This is echoed by Local Plan Policy CL10. The application site is not subject to any statutory designations in terms of nature conservation. There are, however, two potential bat roosts in the mature trees that exist on the boundary of the site and a population of water voles in the south eastern corner of the site. The proposals will not have an impact upon these species and the creation of new planting areas in association with the development will provide additional habitat for birds and other wildlife. This is consistent with Local Plan Policy CL10 which aims to enhance bio-diversity. In view of the foregoing no obvious conflict would exist with the provisions of national planning policy guidance or the provisions of the Development Plan.

#### *Water Resources*

**3.32** The site is adjoined to the south-east by the River Gipping. There are also a number of drainage ditches within the south-eastern corner of the site. The key objectives of Development Plan policies are to minimise the risk of flooding and to enhance surface and ground water quality. More specifically Structure Plan Policy ENV14 provides that development will not be acceptable if it materially impedes the flow or storage of flood water or increases the risk of flooding elsewhere. This is echoed by Local Plan Policy SC5. Local Plan Policy CL4 goes on to encourage the conservation of Mid Suffolk's River Valleys, while Policy CL10 seeks to conserve and enhance wildlife and other features adjacent to rivers.

**3.33** The proposed development will increase the amount of impermeable surface coverage on the site and the rate of surface water run-off generated from the site. This increase in surface water run-off may in turn affect the volume of water in the local watercourses and River Gipping, with the potential to exacerbate the risk of flooding within the vicinity of the site.

**3.34** In order to address these issues, a Flood Risk Assessment has been prepared to accompany the planning application. These reports demonstrate that through the use of Sustainable Drainage Systems (SUDS) and a compensatory flood storage solution in the south-eastern part of the site, the risk of flooding can be overcome downstream in line with PPS25.

**3.35** It is proposed to attenuate surface water run-off through the creation of balancing ponds and watercourses and the provision of porous pavements in line with the Environment Agency recommendations. In addition the surface water drainage system will incorporate mechanisms to prevent pollution, such as oil interceptors and trapped gullies.

**3.36** There is no foul water drainage system on-site but a sewer will be requisitioned. The provisional proposals are detailed in the Flood Risk Assessment. Subject to appropriate phasing arrangements no obvious conflict would exist with the provisions of Local Plan Policy SC1.

*Air Quality and Noise*

**3.37** Structure Plan Policy ENV5 indicates that new development, including transport development, should be located to avoid air, noise and water pollution. Similar provisions exist within Local Plan Policy E12. As has been demonstrated in the Environmental Statement that accompanies the planning application, the proposal would not have an adverse impact upon local air quality. Subject to the implementation of appropriate mitigation measures, significant noise impacts are not predicted during the construction phase. The operational noise impacts are also capable of mitigation. The necessary mitigation measures will have to be agreed with the local authority but are capable of being achieved. In the circumstances no obvious conflict with the provisions of the Development Plan are anticipated.

**Suffolk Local Transport Plan**

**3.38** The Suffolk Local Transport Plan 2006-2011 (LTP) has been prepared by Suffolk County Council in consultation with District Councils and other 'stakeholders'. The LTP sets out how the County Council intends to meet the Government's shared transport priorities of improving access to key services, improving safety for road users, alleviating congestion and managing the impacts of transport on air quality. It sets out countywide transport policies, proposals and bids for Government funding, and developer contributions. The objectives of the LTP include encouraging investment in rail infrastructure to increase the proportion of freight carried by rail.

#### **4. CONCLUSION**

**4.1** The importance of ports, and associated distribution hubs, to the UK economy cannot be overstated. As well as handling goods, a port can act as a gateway for the transshipment of goods, or as a place for the processing of products, before they reach their final destination. It is therefore against this national economic backdrop that the proposals have emerged. Indeed the Regional Spatial Strategy identifies the Haven Gateway sub-region, which includes the ports of Felixstowe, Harwich and Ipswich, as a significant area for employment development. It requires Local Development Documents to make provision for not less than 50,000 additional jobs.

**4.2** While the Mid Suffolk Local Plan is due to be replaced, it is likely to be sometime before a new Local Development Framework is in place. In the meantime it would appear that there is not a readily available supply of suitable sites within the Haven Gateway sub-region to accommodate a distribution hub that has both road and rail access.

**4.3** The application indicates the construction of a multi-modal distribution park containing approximately 120,000 m<sup>2</sup> of floor space plus the formation of rail sidings and container storage areas in a landscaped setting. The proposed development is intended to be a distribution hub that serves the Haven Gateway ports.

**4.4** In the light of the supporting evidence provided within this document, the Environmental Statement and other reports accompanying the planning application, it has been demonstrated that the proposals would be consistent with the Regional Spatial Strategy and go a significant way to meeting the stated objectives. Furthermore the proposals would not conflict with existing Development Plan policies.

**Cambridge**

Trumpington Road  
Cambridge CB2 9LD  
t: 01223 841841  
f: 01223 845150

**Norwich**

16 Upper King Street  
Norwich NR3 1HA  
t: 01603 763939  
f: 01603 763899

**Cambridge**

Stonecross  
Trumpington High Street  
Cambridge CB2 9SU  
t: 01223 841842  
f: 01223 840721

**Saffron Walden**

51 High Street  
Saffron Walden  
Essex CB10 1AR  
t: 01799 516688  
f: 01799 510059

**Chelmsford**

Steeple House  
Church Lane  
Chelmsford CM1 1NH  
t: 01245 250998  
f: 01245 251214

**Fort William**

33 High Street  
Fort William PH33 6DJ  
t: 01397 702433  
f: 01397 702010

**Castle Howard**

The Estate Office  
Castle Howard  
York YO60 7DA  
t: 01653 648057  
f: 01653 648529

**Inverness**

Alder House  
Cradlehall Business Park  
Inverness IV2 5GH  
t: 01463 796050  
f: 01463 798246

**Ipswich**

Brightwell Court  
Martlesham Heath  
Ipswich IP5 3RF  
t: 01473 611644  
f: 01473 610211

**Perth**

5 Atholl Place  
Perth PH1 5NE  
t: 01738 630666  
f: 01738 627264

**London**

8 Pollen Street  
London W1S 1NG  
t: 0207 493 3043  
f: 0207 493 2213

**Milton Keynes**

Sapphire House  
Opal Court, Opal Drive  
Fox Milne  
Milton Keynes MK15 0DF  
t: 01908 202190  
f: 01908 202199

**Northampton**

4 Waterside Way  
The Lakes  
Northampton NN4 7XD  
t: 01604 632200  
f: 01603 604466



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