HEARING STATEMENT
SUBMITTED ON BEHALF OF
TRINITY COLLEGE
CAMBRIDGE
RESPONSE TO INSPECTOR’S
MATTERS, ISSUES AND
QUESTIONS:
MATTER 3 – AREA SPECIFIC
STRATEGIES
RURAL AREAS, POLICY
SCLP35: LAND AT
INNOCENCE FARM
1.0 Introduction

1.1 This Hearing Statement has been prepared by Bidwells on behalf of Trinity College Cambridge ("TCC") in support of the land within its ownership at Innocence Farm (hereafter “the site”). TCC is the sole landowner of the site and Bidwells, on its behalf, has been promoting the site through the emerging Suffolk Coastal Local Plan.

1.2 The purpose of TCC’s involvement in the Examination process is to demonstrate deliverability and therefore the soundness of the Local Plan insofar as it is relevant to Policy SCLP12.35. We respond to the following Matters, Issues and Questions of relevance to the site, namely:

- Matter 3: Area Specific Strategies - Development Allocations
  - Issue 1: Are the proposed Area Specific Strategies, allocations and policies justified, effective and consistent with national policy?
  - Rural Areas, Policy SCLP12.35 Questions 3.47 – 3.51
2.0 Responses to the Inspector’s Matters, Issues and Questions

Policy SCLP12.35: Land at Innocence Farm

Question 3.47: “Is the proposed allocation of land at Innocence Farm justified, taking into account the employment land requirement for the plan area and reasonable alternatives for port related development, and is it based on proportionate evidence?”

The needs of the Port of Felixstowe are bespoke

2.1 The Lichfields report was commissioned to assess the future land requirement for Port-related logistics development to support the continued prosperity of the Port in a competitive market both in the UK and internationally. It recognises the need for the allocation of land specifically to support the Port. This evidence is bespoke and goes much further than the Employment Land Needs Assessment, which identified a minimum of 11.7ha of general employment land required across the District. The economy in East Suffolk is unique in that 45% of the total workforce in the Felixstowe area is employed by the Port of Felixstowe or related businesses¹. The importance of the Port as a source of employment and contributor to the local economy cannot be overstated. It is a highly specialised operation and its needs cannot be determined by a standardised Employment Land Needs Assessment.

Evidence of occupier demand

2.2 TCC's Regulation 19 representations drew upon evidence provided by Patrick Stanton, Head of Logistics and Industrial at Bidwells, regarding the demand for warehouse space in Felixstowe². A chronic lack of suitable warehouse space is a key issue for the Port of Felixstowe, with a growing occupier demand for sizeable warehousing units from 50,000sqft upwards. The majority of occupiers are looking to expand to service additional work and others are seeking fresh representation at the Port to take advantage of the growing demand for services. There is also considerable demand for container storage and lorry parking, which both require open storage yards that are in short supply.

The Lichfields evidence is conservative

2.3 The Lichfields report identified three growth scenarios based on varying land requirements depending on the increase in container traffic, measured in TEU³, through the Port over the emerging Local Plan period. It concluded that the low case for container trade growth would require

¹ Suffolk Coastal District Council Local Plan Core Strategy and Development Management Policies (July 2013) paragraph 4.37, page 73.
³ Twenty-foot Equivalent Units
an additional 26.3ha of land solely for Port-related logistics uses, the central growth case would
require 66.9 ha of land and the high case would require 103.8 ha of land.

2.4 TCC’s representations to the Regulation 19 Local Plan set out a number of reasons why the
Lichfields report appears to underplay the amount of land actually required during the emerging
Plan period to ensure the future competitiveness of the Port of Felixstowe. These include the
ongoing shift towards the use of Port-centric logistics facilities, the higher TEU throughput
projections published by the Department for Transport (“DfT”) since the Lichfields’ report was
published and the growing need for Port-side land to support core port operations, some of which
is displacing logistics facilities.

2.5 The representations were accompanied by a report from MDS Transmodal, a specialist
consultancy in the economics of international and domestic freight, which explored the needs of
the Port further. MDS Transmodal’s evidence supported the view that the Lichfields’ report provides
a conservative estimate of the land required to support the future competitiveness of the Port. It
suggested that the DfT’s TEU growth projections should be used and applied to the need for growth
across the Port’s whole estate (i.e. both on-Port and off-Port land). This methodology results in a
requirement for 122ha of new land allocations, taking account of limitations on the capacity of the
Port’s quayside.

2.6 Even if this level of growth came forward, MDS Transmodal highlight that Felixstowe would still
offer significantly less space for Port-centric logistics than London Gateway, its principal
competitor. If the Port wanted to offer the equivalent area of space as London Gateway to match
that port’s emerging competitiveness and fully capitalise on the quay metres it has available then
a total of 643 ha would be required across the Port-estate, which would represent an increase of
303 ha over the existing supply.

2.7 Whilst estimates of the precise amount of Port-related land that will be needed during the emerging
Plan period will always fluctuate to a degree depending the methodologies employed and a variety
of uncontrollable external factors, there is clearly a need for a strategic scale intervention to provide
a substantial amount of additional land to help secure the competitiveness of the Port of Felixstowe
in the face of growing threats in the market. TCC is satisfied that the allocation of Innocence Farm
would provide an appropriate intervention and that it is a sound way to support the future of the
Port. The need for further land can be reassessed when the Plan is subject to a statutory five-year
review, if necessary.

Existing sources of pipeline land supply cannot be relied upon

2.8 The Port-related Development Land Review prepared to accompany TCC’s representations
explores the extent of other land that may be available to help meet the need for Port-related
employment use during the emerging Plan period.

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4 Port of Felixstowe Growth and Development Needs Study (July 2018) Table 4.2, page 39.
5 TCC Regulation 19 representations report, paragraphs 3.28 to 3.31.
2.9  Taking account of expected losses of existing warehouses and container yards within the Port’s core operational area, the Review identified a net potential supply of 32.48ha of land that may be suitable and available for additional Port-related employment development during the emerging Plan period. Of this potential net supply, just 5.9ha is specifically allocated and protected for Port-related development\(^6\). This represents a substantial reduction on the 67ha of potential pipeline supply originally identified by the Lichfields report. Detailed assessments are set out in our Land Review report.

2.10  Even if all of this potential pipeline supply came forward for development during the emerging Plan period, it would represent less than half the land required to address even the ‘central case’ growth scenario identified by Lichfields once anticipated losses are taken into account. The ‘central case’ scenario is the minimum that Lichfields recommended SCDC plan for through the emerging Plan. The land available falls even further short of the 122ha that MDS Transmodal’s evidence suggests is required, taking into account the DfT’s more recent projections for UK container trade and the need to enhance the capacity of on-port land as well as off-port supporting industry. There is of course a risk that none of this land will be delivered for Port-related use.

**Alternative promoted sites are less suitable than Innocence Farm**

2.11  The Lichfields report assessed 10 site opportunities for potential new allocations to support the future needs of the Port which were identified through Suffolk Coastal District Council’s call for sites process. A range of criteria\(^7\) were applied to the sites to determine their suitability and deliverability and Innocence Farm was scored the joint highest ranking. The other highest-ranking site was land adjacent to ‘Seven Hills’ A12/A14 junction, Felixstowe Road, Nacton, which has been promoted by the landowner for business park use and allocated for such use in the East Suffolk Local Plan under policy SCLP12.20 (Land at Felixstowe Road).

2.12  Our Land Review considered the availability of additional sites within the area of search along the A14 corridor east of the Orwell Bridge - recommended in the Lichfields report as the most appropriate location for off-Port supporting activity\(^8\). Sites that were promoted by other parties during the Local Plan process were included and assessed for their availability, suitability and deliverability. Of those that were genuinely available, none were more suitable for Port-related development than Innocence Farm\(^9\).

2.13  Regulation 19 representations made by the Kirton and Trimley Community Action Group (KATCAG)\(^10\) questioned why an additional 90.2 ha site put forward in response to the Council’s

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\(^7\) Port of Felixstowe Growth and Development Needs Study (July 2018) paragraph 5.33, pages 48 - 49 and Appendix 6.

\(^8\) Port of Felixstowe Growth and Development Needs Study (July 2018) paragraph 4.26, page 40.

\(^9\) Trinity College Cambridge Regulation 19 Representations Port of Felixstowe Port-Related Development Land Review (February 2019) paragraph 5.5 – 5.9, page 21.

\(^10\) Kirton and Trimley Community Action Group Regulation 19 Representations (February 2019) paragraphs 9 and 10.
Issues and Options Local Plan consultation, Land north west of Walk Farm, Levington\textsuperscript{11}, had not been considered as an alternative site for allocation via the Local Plan. This site is mapped online in the consultation responses to the Issues and Options Local Plan\textsuperscript{12} and was assessed via the Issues and Options Sustainability Appraisal (August 2017 – site 347). The majority of this land, comprising 22.5ha of land at Seven Hills\textsuperscript{13} and 33.1ha of land west of Walk Farm, was assessed separately via the Lichfields report and our Land Review. We understand that the land between these two sites was not put forward for allocation in representations responding to the Regulation 18 Local Plan consultation and, as the KATCAG representations make clear, the ‘agent’ who put the wider area forward as one parcel remains unknown to the owner of the Seven Hills site. It is understood that the wider 90.2 ha site is within multiple land ownerships; potentially the cause of the reduced site area promoted during the later stages of Plan preparation and casting doubt over deliverability, even if it was available. The Seven Hills land is allocated for business park use in the submitted Local Plan (ref: site SCLP12.20) and the remaining land at Walk Farm has been fully assessed and discounted.

2.14 It is therefore evident all reasonable alternatives have been considered and there are no sites that can fulfil the need for further Port-related Local Plan allocations more suitable than Innocence Farm. Within the context of the bespoke assessment of land required to support the future competitiveness of the Port of Felixstowe, the allocation of Innocence Farm is demonstrably justified.

2.15 Support for the development of Innocence Farm has been confirmed by the Port of Felixstowe through their representations. Engagement between TCC and the New Anglia Local Enterprise Partnership and Haven Gateway Partnership also confirms support for the development in principle. A letter confirming this position from the Haven Gateway Partnership is enclosed at Appendix 1.

\textsuperscript{11} Suffolk Coastal Local Plan Review Issues and Options Initial Sustainability Appraisal Site Assessments (August 2017) Site 347 Land north west of Walk Farm, Levington. Index of Submitted Sites table, page 24 and Site Assessment table, page 912.
\textsuperscript{12} Suffolk Coastal Issues and Options Local Plan Consultation Responses, Levington & Stratton Hall sites.
\textsuperscript{13} Lichfields site 9, Bidwells Land Review site AS2.
**Question 3.48: “Is there any matter which would mean that the site would not be developable?”**

**East Suffolk evidence base**

2.17 The East Suffolk Council Local Plan evidence base does not identify any factor precluding the delivery of this site that cannot be overcome by appropriate mitigation. The SHEELA site assessment\(^{14}\) does not identify any critical factors threatening the deliverability of the site that cannot be overcome, and the Lichfields Report assessed the site as the most suitable site for Port-related supporting industry\(^{15}\).

**TCC commissioned evidence base**

2.18 To support its Regulation 19 representations, TCC submitted a Vision Statement and Conceptual Masterplan to set out its emerging ideas for the development of the site, taking account of site constraints and opportunities. The masterplan showed how the site can come forward to fulfil the emerging Plan’s aspirations and deliver the development required to support the Port, alongside a rewilded landscape space at the eastern end of the site to protect the amenity of residents in Kirton and Trimley St Martin and provide a new recreational resource for local people, as shown in the extract below.

2.19 TCC also submitted a Transport Technical Report\(^{16}\) which confirmed a detailed access strategy, including the design of a proposed overbridge crossing the A14 to access phase 2 of the development, alongside the scope of further highways impact assessment that was to be undertaken.

2.20 This work has now been developed further with detailed highway modelling to assess the impact of the proposed development on the surrounding road network. This work, which uses Suffolk County Council’s own Suffolk County Transport Model, has shown that that the development is not expected to have a significant impact on the surrounding highway network in terms of operational capacity and delay, and that the Phase 1a and 1b development can accommodated by the Phase 1 access strategy. The draft modelling report has been shared with Suffolk County Council (the Local Highways Authority) and Highways England and both parties have indicated they are satisfied the allocation of the site can be delivered without causing a severe impact on the surrounding highway network. A Statement of Common Ground between Highway England, the Local Highway Authority and Trinity College Cambridge is submitted with these representations. The modelling report can be shared with the Inspector if required.

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\(^{14}\) Suffolk Coastal District Strategic Housing and Economic Land Availability Assessment (December 2018) Site Assessment 706 Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin, page 537.

\(^{15}\) Port of Felixstowe Growth and Development Needs Study (July 2018) Table 5.3 Appraisal Summary, page 50.

\(^{16}\) Trinity College Cambridge Regulation 19 Representations Transport Technical Note (February 2019).
2.21

**Figure 1: Extract of the Conceptual Masterplan for Innocence Farm taken from the TCC Regulation 19 Representations Vision Statement (February 2019)**

2.22

TCC has commissioned further site-specific technical work since the Regulation 19 consultation stage to assess potential landscape, visual, heritage, noise, air quality, lighting and ecological impacts in more detail to inform the early stages of preparing a planning application. Initial findings have not raised any serious concerns about impacts that cannot be suitably mitigated at the planning application stages, or the developability of the site more generally. A summary of
outcomes so far is provided at Appendix 2. Copies of draft reports can be shared with the Inspector if required.

**The scheme is viable and deliverable**

2.23 Initial stage appraisals conducted by TCC’s advisors have confirmed that the development of the site, as put forward in the Conceptual Masterplan, is viable. It is important to reaffirm that TCC has owned and managed the Trimley Estate since 1933 and is a long-term stakeholder in the economic wellbeing of the Felixstowe peninsula. TCC owns and manages a significant proportion of the Port of Felixstowe’s existing hinterland and has significant knowledge and expertise in Port-related logistics operations. The College has the means, expertise and infrastructure in place to deliver this scheme and it will look upon the development of Innocence Farm as more than just a standalone project.
Question 3.49: “In terms of the proposed access to the A14 road, is the policy sufficiently clear so that it is evident how a decision maker should react to a development proposal?”

2.24 We consider that policy SCLP12.35 is sufficiently clear. It clarifies that a dedicated HGV access is required to the A14 at the western end of the site, but it does not preclude this coming forward in a phased manner. Flexibility is built into the policy wording, which is crucial to enable the optimum access design and the phasing of development to be agreed at the planning application stage, informed by technical transport and highway evidence. It will also allow further consideration of the likely interplay between road and rail transportation at the appropriate time.

Question 3.50: “Is the provision of a rail connection justified and is it realistic? Is sufficient land allocated to accommodate adequate railway infrastructure to serve the site?”

The provision of a rail connection is justified

2.25 Whilst the delivery of a rail connection is not essential to the deliverability of the Innocence Farm allocation, the location of the site adjacent to the railway provides an important opportunity that could enable more freight processed by the Port of Felixstowe to be transported inland by rail. The sustainability advantages of this modal shift justify the draft Plan’s requirement to investigate the opportunities to connect the Port and Innocence Farm by rail.

The provision of a rail connection is realistic

2.26 TCC has taken advice from MDS Transmodal on the potential for the delivery of a railhead on land south of the A14 within the allocation site at Innocence Farm. This advice has suggested there is a strong strategic commercial case for the delivery of the railhead.

2.27 At the national level, transportation of freight by rail is growing and this looks set to continue. MDS Transmodal has recently produced updated rail freight demand forecasts for Network Rail which indicate that overall tonnages of rail freight will grow by 70% between 2016/17 and 2043/44, with intermodal freight growing by 250% during the same period. This would follow the 44% increase in intermodal rail freight volumes seen in the last 15 years, which have been driven by increasing road transportation costs and the growth of imported containerised consumer goods from abroad through ports with rail terminals.

2.28 At the Port of Felixstowe, MDS Transmodal estimate that around 30% of containerised cargo, or 8 million tonnes per annum, is currently transported by rail and significant investments have been made in recent years to increase capacity. These include the UK’s most sophisticated locomotive traverser and the Port’s new £37 million North Rail Terminal, which will double rail capacity. The modal share for rail freight container movements is expected to increase as a result of this improved infrastructure.

2.29 Strong demand for rail freight facilities is likely to continue because it is generally cheaper than road HGV transportation, with rising cost savings as the distance increases. For example, MDS Transmodal estimate that:
The door-to-door cost of a container moved by rail from Felixstowe to the Midlands is £185. By road, it is £230.

The door-to-door cost of a container moved by rail from Felixstowe to the north-west of England is £370. The equivalent journey by road is around £500.

2.30 There is therefore likely to be strong demand for use of further rail freight facilities at Felixstowe from haulage operators.

2.31 There is also sufficient capacity on the Felixstowe branch line to support further growth. MDS Transmodal have considered existing patterns of intermodal rail services on the branch line and estimated that a new railhead could result in seven additional freight paths across a 24-hour period between Innocence Farm and Westerfield without requiring the timings or stopping patterns of existing services to be adjusted. A new freight loop was recently installed by Network Rail to provide additional capacity on the Felixstowe branch line.

2.32 A new connection at Innocence Farm would therefore appear likely to provide a good commercial opportunity for a specialist operator to control their own terminal. There is no longer a monopoly in this market and there are a number of large multi-modal freight operators that are likely to be interested, such as Freightliner, Maritime Transport and GB Rail Freight. Controlling their own terminal would enable these parties to exert greater control over terminal capacity and train paths and an opportunity to re-position empty containers by rail for storage close to the Port, avoiding demurrage costs (costs for the storage of containers at the port for longer than the permitted free of charge period).

2.33 The economic case for these parties is expected to be strong. MDS Transmodal have provided initial layout proposals which confirm that the site can accommodate the track layout required at a modern intermodal rail terminal. The layouts have been subject to a high-level costing exercise which confirms that likely revenues from the loading and unloading of cargo will provide a sufficient margin for the project to be financially viable.

2.34 Critically, providing a new terminal at Innocence Farm would introduce more competition in the rail freight market and is likely to reduce the costs associated with rail transportation, encouraging a further modal shift.

Sufficient land is allocated providing the allocation identifies the potential for the expansion of the developable area south of the A14

2.35 As confirmed in TCC’s Regulation 19 representations, the extent of the parcel of land proposed for allocation south of the A14 is not sufficient to accommodate a new railhead at Innocence Farm. The land identified within the allocation is only 500m long. Advice from MDS Transmodal suggests that at least 775m of terminal length will be required to accommodate modern intermodal trains.

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Nevertheless, it is acknowledged that the indicative master plan\textsuperscript{18} associated with the allocation and policy SCLP12.35 includes two arrows on the western and eastern boundaries indicating potential railway connections extending beyond the allocated land, shown on the extract below.

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{suffolk_coastal_final_draft_local_plan_policy_sclp12.35_indicative_master_plan_january_2019.png}
\caption{Extract of the Suffolk Coastal Final Draft Local Plan Policy SCLP12.35 Indicative Master Plan (January 2019)}
\end{figure}

\textbf{2.36} If the intention behind the inclusion of these arrows is to identify the potential for additional land to be required to deliver railway connections and the Council and Inspector are comfortable that this is sufficiently clear to decision makers, then TCC is also content with the approach.

\textsuperscript{18} Suffolk Coastal Local Plan Final Draft (January 2019) indicative master plan for Innocence Farm, page 300.
Question 3.51: “In regard to the criteria points a) – e) which specifies requirements for planning applications, would the policy be effective by not requiring an air quality assessment, landscape and visual assessment, noise assessment or transport assessment? Is point e) consistent with the findings of the HRA in referring to Habitats Regulation Assessment Screening?”

2.37 The final sentence of policy SCLP12.35 confirms development which would result in significant adverse effects which could not be appropriately mitigated will not be permitted. Despite not explicitly listing all of the technical evidence set out in this question, the full suite of assessments would be required to demonstrate that development of the site would not result in significant adverse impacts or that appropriate mitigation can be provided. TCC has already instructed the first stage of all of the assessment work listed in question 3.51 to inform the emerging proposals and to support a future planning application. Preliminary findings show that with appropriate mitigation there will not be significant adverse effects.

2.38 The policy is therefore effective as drafted, however if the Inspector considers that it is necessary for soundness to list a specific requirement for additional technical assessments cited, TCC would not object.

2.39 East Suffolk Council have acknowledged that reference to HRA screening is a typographical error and TCC would also not object to the removal of the word “screening” from criterion e) of the policy.
APPENDIX 1

HAVEN GATEWAY PARTNERSHIP LETTER
1 August 2019

Mr Sam Metson
Partner, Planning
Bidwells
Bidwell House
Trumpington Road
Cambridge
CB2 9LD

Dear Mr Metson

Innocence Farm

I am writing to you in support of the proposed Innocence Farm allocation for Employment Land within the East Suffolk Council Local Plan.

The Haven Gateway Partnership is a public/private economic partnership which includes within its partners Local Authorities and businesses from North Essex and South Suffolk. The Partnership was formed in 2001 recognising the importance of the Haven Ports and, in particular, the strength of the Port of Felixstowe to the UK economy. The economies of North Essex and South Suffolk are integrally linked through the shared reliance upon sectors such as logistics driven largely by the ports of Felixstowe and Harwich as well as Stansted Airport and, consequently, the importance of strategic road networks such as the A14, A12 and A120 as well as the Great Eastern Mainline and the West Anglia rail network and its capacity for the transport of freight. The role of the Partnership is to support its partner agencies to drive sustainable economic growth and support the growth of infrastructure in its widest sense.

The Partnership is of the view that there is a very real need for additional employment sites – particularly grow-on space – for businesses in North Essex and South Suffolk. This is especially pertinent along the A14 corridor from Felixstowe where fit-for-purpose facilities are in very short supply but in high demand, much of which is driven by the port-centric activities of the Port of Felixstowe which is the largest container port in the UK receiving 43% of the UK’s container shipping of which in excess of 70% is destined for the Midlands and the North of England. We consider the development of Innocence Farm to be a crucial factor in maintaining the national function of the Port of Felixstowe as the UK’s largest container port playing a vital role in the country’s
competitiveness. The site will also offer suitable space for local SMEs which are of vital importance to the economy of Suffolk allowing them to expand when they currently find their growth potential constrained by the lack of such space. The proposed development will also provide an opportunity for Suffolk to further its ambitions of attracting inward investors by offering appropriate employment sites.

We support the proposed Innocence Farm development as an employment site due not only to its generation of 2,000 jobs in the greater Felixstowe area but as a provider of much-needed warehouse and office space to support the growth of the Port of Felixstowe and the growth of SME businesses in the area as well as supporting the inward investment ambitions of the Local Authorities.

Yours sincerely

Anita Thornberry
Executive Director
APPENDIX 2

TECHNICAL EVIDENCE BASE UPDATE
SUMMARY OF SUPPORTING TECHNICAL EVIDENCE

The purpose of this note is to summarise the suite of emerging technical evidence commissioned by Trinity College Cambridge to inform the early stages of preparation of a planning application for Land at Innocence Farm and help demonstrate the deliverability of the proposed employment allocation. We can share draft reports with the Inspector if required.

Transport

A Transport Modelling Report has been undertaken by Royal Haskoning DHV. This has been prepared using Suffolk County Council’s own Suffolk County Transport Model. Its outcomes indicate that, taking account of the proposed phased access strategy (as set out in the submitted Vision Statement and Conceptual Masterplan and Transport Technical Report), the proposed development would not result in significant adverse impacts on the highways network.

Engagement with Suffolk County Council and Highways England has confirmed that both parties consider the proposed allocation of the site is deliverable and its location near to the Port of Felixstowe could help minimise unnecessary travel by Heavy Goods Vehicles. Further engagement on more detailed elements of the access strategy will continue as the proposals move into the planning application preparation stage.

Rail Strategy

Specialist freight and logistics consultancy MDS Transmodal has been commissioned to provide advice on rail connection strategy. The advice confirms that the wider commercial context supports the development of a new intermodal terminal at the site because:

- Road haulage costs are rising while at the same time rail freight is becoming more efficient;
- Rail-linked distribution parks are continuing to be developed across the UK, reducing the costs associated with transferring cargo from rail further afield; and
- Rail freight demand forecasts prepared by MDS Transmodal for Network Rail indicate that rail freight will grow nationally by 70% between 2016/17 and 2043/44, and intermodal freight growing by 250% during the same period. This is driven in part by the favourable cost differential between road and rail haulage and the growing proportion of UK consumer goods that are imported from abroad through rail-linked ports.
- Around 8 million tonnes of containerised cargo is currently moved to and from the Port of Felixstowe by rail freight and there is capacity for this to grow.

The strategic case for a new intermodal rail terminal at Innocence Farm is based around two key commercial opportunities, namely:

- To serve the associated Port-centric warehousing development; and in particular the opportunity to redistribute cargo by rail to the Midlands, north of England and Scotland once it has been processed and to cargo and empty containers to the Port; and
- For a specialist maritime container haulier/logistics operator to develop their own distribution terminal that is independent of the Port of Felixstowe.

A new rail freight connection at Innocence Farm would provide more competition in the market for loading and unloading of freight to rail in Felixstowe. This has the potential to reduce the costs associated with rail freight and encouraging a greater modal shift.
MDS Transmodal have provided initial layout proposals which confirm that the site can accommodate the track layout required at a modern intermodal rail terminal. The layouts have been subject to a high-level costing exercise which confirms that the revenues likely to be generated by the loading and unloading of goods at the terminal will generate a sufficient margin for it to be a financially viable project.

There is therefore a strong case for developing a new rail terminal at Innocence Farm.

**Landscape and Visual Impact**

A Landscape and Visual Impact Assessment is currently being prepared by LDA Design. It describes the existing landscape and views, considers their sensitivity to change and identifies the changes likely to arise from the proposed development on the basis of a “worst-case scenario”.

Its initial findings suggest that the development’s effects would be, on the whole, no greater than moderate and in many cases slight. Additionally, in many cases the impact of development would reduce to negligible as the proposed mitigation planting matures. To date, key impacts are assessed as follows:

- Slight adverse effects would initially be experienced in medium range views from the west, reducing to negligible as planting matures.
- Moderate adverse effects would initially be experienced in medium range views from the north, east and south, reducing to slight and neutral as planting matures.
- Major-moderate effects would be experienced by footpath and railway users to the south of the site arising from the proposed rail head. Moderate effects would be experienced by users of Cycle Route 51.
- Effects on both the Suffolk Coast and Heaths AONB and the Heritage Coast are assessed to be negligible.
- Users of and residents along the local roads to the north, west and east of the site would experience moderate effects, decreasing to slight as planting establishes.
- Kirton and Trimley St Martin residents would experience slight effects in areas where the development would be visible – this would generally be along the western edge of both settlements.

**Heritage**

An Initial Heritage Appraisal has been undertaken by Bidwells Heritage. It identifies the presence of 6 designated heritage assets near to the Site and 5 properties which are considered to be non-designated assets, as follows:

<table>
<thead>
<tr>
<th>HERITAGE ASSET</th>
<th>DESIGNATION</th>
<th>IMPACT OF DEVELOPMENT ON SETTING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Church of St Mary and St Martin</td>
<td>Grade II listed</td>
<td>None</td>
</tr>
<tr>
<td>Manor House, Bucklesham Road</td>
<td>Grade II listed</td>
<td>None</td>
</tr>
<tr>
<td>White Horse Public House</td>
<td>Grade II listed</td>
<td>None</td>
</tr>
<tr>
<td>Smithy House</td>
<td>Grade II listed</td>
<td>None</td>
</tr>
<tr>
<td>The Maltings</td>
<td>Grade II listed</td>
<td>Negligible</td>
</tr>
<tr>
<td>Kirton Hall</td>
<td>Grade II listed</td>
<td>Negligible</td>
</tr>
<tr>
<td>Innocence Farmhouse</td>
<td>Non-designated heritage asset</td>
<td>Minor Adverse</td>
</tr>
<tr>
<td>Morston Hall</td>
<td>Non-designated heritage asset</td>
<td>Negligible-none</td>
</tr>
<tr>
<td>Remains of Trimley Heath Radar Station</td>
<td>Non-designated heritage asset</td>
<td>Minor Adverse</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>-------------------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>Prince Albert Cottages</td>
<td>Non-designated heritage asset</td>
<td>Negligible</td>
</tr>
<tr>
<td>Trimley St Martin School</td>
<td>Non-designated heritage asset</td>
<td>Negligible</td>
</tr>
</tbody>
</table>

Confirmation as to whether relevant properties among the above are to be considered as non-designated assets would be obtained from the local planning authority at the detailed design stage. Recent updates to PPG guidance (July 2019) which encourage a high degree of selectivity for non-designated assets, would apply.

Impacts of the development on these assets are considered to represent either “no harm” or “less than substantial harm” when assessed against the policies of the NPPF. These are considered to be at the lower end of the scale of impact and would not cause effects giving rise to substantial loss of significance by way of impact upon setting.

The remains of the Trimley Heath Radar Station are located within the site boundary and its total loss would be required to facilitate the development. However, it is no longer in use, many of the onsite structures are no longer visible above ground and the three structures that remain are in disrepair, hidden by surrounding foliage and are inaccessible to the public. They are considered to hold a low level of heritage significance and as such their loss is not considered to weigh significantly against the benefits of the proposals, including the new employment generated by the scheme.

As detail progresses further assessment of impact on heritage assets will be undertaken.

**Ecology**

Southern Ecological Solutions has been commissioned to undertake a full suite of ecological surveys to confirm the ecological significance of the site and identify appropriate design interventions to ensure that the scheme delivers a net biodiversity gain.

A Preliminary Ecological Appraisal undertaken in 2016 and updated in 2019 identifies the presence of a variety of habitats, the majority being of low ecological value because the site is dominated by intensively farmed arable agricultural land. Areas of ecological value are considered to be limited to the existing buildings, woodland, field margins, hedgerows, scrub, ditches and a stream. A range of Phase 2 surveys are being undertaken during the relevant survey seasons to support the future planning application.

The masterplan is likely to be able to deliver biodiversity gains through the retention of the majority of existing features of higher value (which are predominantly located on the boundaries of the site) and the provision of new ecological features within the new renaturalised landscape and perimeter bunds.

**Lighting**

An initial Lighting Assessment is underway by MLM Consulting Engineers to consider existing ambient lighting around the perimeter of the site, provide a provisional lighting strategy and appraise the impacts that could arise from the scheme.

The preliminary lighting design uses the latest technology to ensure safe, well-lit working areas are provided whilst minimising light spill beyond the boundaries of the site. Lighting is to be focused only where it is required and dimmable LED lighting, intelligent movement controls, baffles/cut off points, dawn/dusk sensors and other obstructive instruments will be used to limit light spillage and reduce energy use. MLM have highlighted that the masterplan already incorporates important light mitigation by including perimeter bunding and landscaping.
The impact of the preliminary lighting design around the perimeter of the site has been subject to initial evaluation. Illuminance readings are anticipated to be within acceptable parameters for all sensitive receptors.

The lighting design employed at Innocence Farm will be significantly more advanced and have a substantially lower impact than the lighting currently used at the Port of Felixstowe, which is likely to remain the main source of light pollution on the Felixstowe peninsula.

**Air Quality**

An Air Quality Technical Report is currently being undertaken by MLM Consulting Engineers.

The baseline air quality data indicates that the site is located in an area of good air quality and is suitable for the proposed use. A review of the transport modelling also shows that additional traffic generated during the operational phase is unlikely to lead to significant air quality impacts. On completion of detailed dispersion modelling at the application stage, appropriate site-specific mitigation measures would be identified in-line with the predicted air quality impacts. A construction dust risk assessment would also be completed to identify and appropriately mitigate impacts arising during the construction stage.

**Noise**

An Acoustic Technical Report is currently being undertaken by MLM Consulting Engineers. It considers the likely impacts of operational noise on the surrounding area based on the indicative masterplan.

The assessment’s preliminary observations are that the existing sound environment at key receptors on Innocence Lane, Kirton Road and Morston Hall Road is dominated by distant road traffic from A14. The assessment appraises the likely impact arising from HGV movements to and from the site (based on the transport modelling), identifying that the change in ambient road traffic noise levels is likely to be negligible.

The masterplan is considered to adopt good acoustic design principles to mitigate potential noise impacts, including perimeter landscaped berms and woodland areas to screen and distance noise sources from residential receptors, particularly along Kirton Road. Additionally, the orientation of buildings as shown on the masterplan would enhance screening of noise from open storage, haulage and ancillary areas to the closest residential receptors to the north, on Innocence Lane. The phased approach to development design would ensure that noise barriers would be in place at an early stage.

The Assessment also identifies ways in which the development could employ techniques to reduce the impact of noise during the operational phase of development, including:

- Low noise refrigeration units;
- Quiet technologies;
- Doors and shutters with soft closing mechanisms;
- Loading bays with sound absorption properties and damping surface covering at the delivery point;
- The adoption of practical noise measures.

Further noise mitigation proposals will be explored at the detailed design stage.