



SPROUGHTON PARISH COUNCIL

Clerk: Mrs S. Frankis
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29th January 2014

Dear Sirs,

Planning Application 3655/13 Comments

Sproughton Parish Council supports elements of this Planning Application which will generate much needed local employment opportunities and will use the heat from the Gt Blakenham Energy from Waste plant that will otherwise be wasted.

However, the Council has considerable concerns regarding the additional traffic volumes that will be generated both during the construction phase of the development and more importantly, under operational conditions.

The concerns we have are as follows:

1. The Transport Statement indicates that the main access for both deliveries and the export of tomatoes is via the new proposed access road to the Southern Greenhouse. The new access road to the Northern Greenhouse will only be used for staff access for parking and for the operation of the proposed Minibus. The detail drawing of the Southern site access road shows it has been designed to allow HGVs to access and egress the site onto the B1113 both in a Northerly and Southerly direction. Whilst we support the egress of HGVs from the site in a Northerly direction, we certainly do not support their egress in a Southerly direction towards Sproughton and Bramford where there exist Environmental Weight Limits of 7.5 tonnes. We would suggest that the site access road is redesigned so that HGVs can only exit the site in a Northerly direction towards the Claydon junction on the A14. Also, as a minimum we would suggest that



signage is erected on the exit from the site directing HGVs to turn left and also indicating that there are Environmental Weight Limits on the B1113 going South.

2. The data included in the Transport Statement also indicates that the expected average weight of each export load would be approximately 3 tonnes. Whilst we understand that tomatoes require a very low packing density (2-6cu metres per tonne) we are concerned that the export of tomatoes will not be undertaken using HGVs, but that this may be diverted onto vehicles of 7.5 tonnes or less. This may then encourage them to use the B1113 through Bramford and Sproughton. Whilst we understand that the SITA data indicates that no HGVs will travel South on the B1113, our concern is that smaller 'export' vehicles will and these have not been included in the traffic assessment.
3. In comparing the traffic flows estimated to be generated from the various proposed developments in the vicinity of Gt Blakenham, it would appear to us that the additional flows are all of similar values (in round numbers, approximately 20 in the busy hours, and 200 per 24 hours). The Planning Inspector for the SnOasis development recognised in his findings that the traffic flows generated would be of a level that adversely impacted the village of Sproughton and an S106 Agreement was put in place to mitigate this impact. Currently, it appears that the provision of the mitigation measures required by the SnOasis and Residential development S106 agreements at Gt Blakenham have faltered due to funding not coming forward from that developer. The prospects of ultimate delivery of those measures is unknown, therefore this development cannot rely on those measures for mitigation purposes. We therefore request that effective and separate mitigation measures be agreed for this development.
4. The Transport Statement also proposes that "For assessment purposes, it has been assumed that 75% of all staff arrivals (including Minibus movements) will be via the B1113 to the North of the site with 25% via the B1113 to the South of the site". By making this assumption, impacts from the proposed greenhouse development are reduced to one third of impacts South of the site. The Applicant offers no evidence to support this 3:1 apportionment, and we suggest that this apportionment could equally be reversed to 1:3 with significant impacts on Sproughton Village.
5. We also feel there is a need for some form of assessment using the existing traffic flows and those predicted from the proposed developments at Gt Blakenham, to be carried out on the junction of Lower Street and the B1113 in Sproughton. We believe this junction is currently at, or nearing, its capacity. Further development traffic flows could worsen congestion in this area, and adversely impact the



community. We would also suggest that the existing and predicted 'Air Quality' at this junction be included in this assessment.

Yours faithfully

S FRANKIS

Mrs S Frankis

Clerk to the Parish of Sproughton

NOTES

1. If the drawing has been received electronically it is the recipient's responsibility to print the document to the correct scale.
2. All dimensions are in millimetres unless stated otherwise. It is recommended that information is not copied off the drawing.
3. This drawing should be read in conjunction with all other relevant drawings and specifications.
4. Existing site markings shown are indicative and drawn based on information available at the time.

KEY

- Vegetation
- Highway Boundary

Mini Bus
 Overall Length 6.330m
 Overall Width 2.150m
 Overall Body Height 2.807m
 Min Body Ground Clearance 0.374m
 Wheel Track 1.800m
 Lock to Lock Time 4.00s
 Kerb to Kerb Turning Radius 6.450m

A Access amended to match plan DA A BA SM 08/12/13

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Client SITA

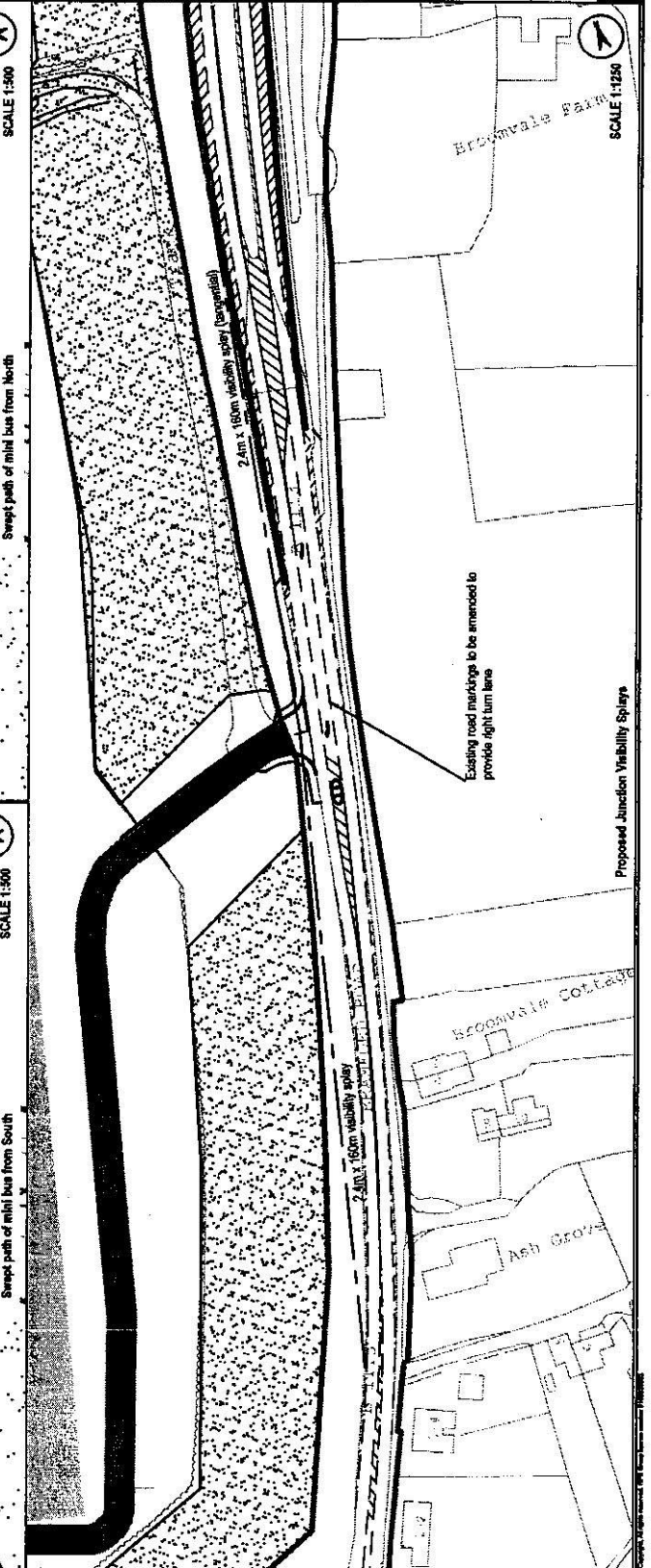
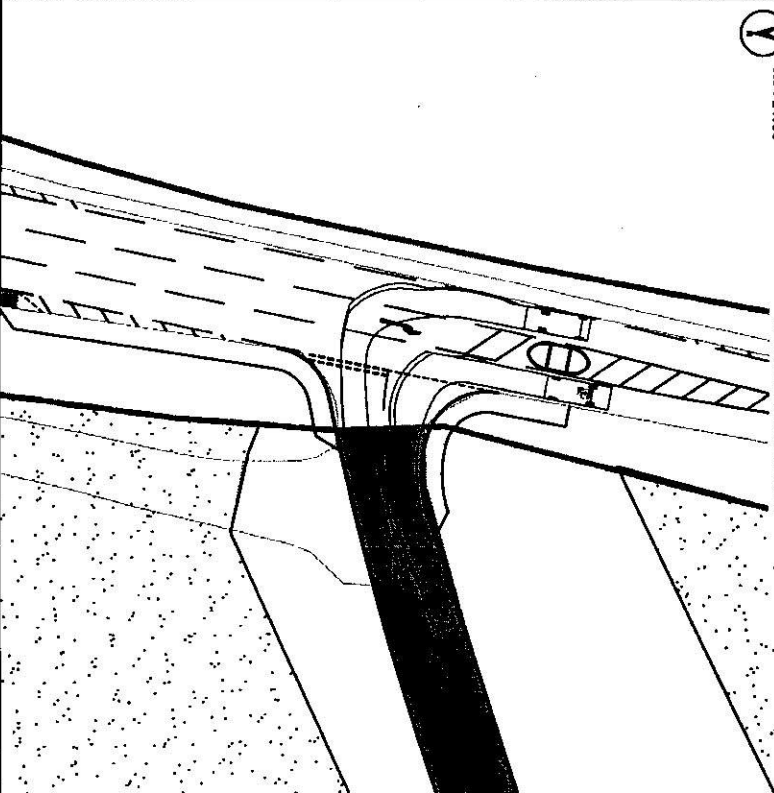
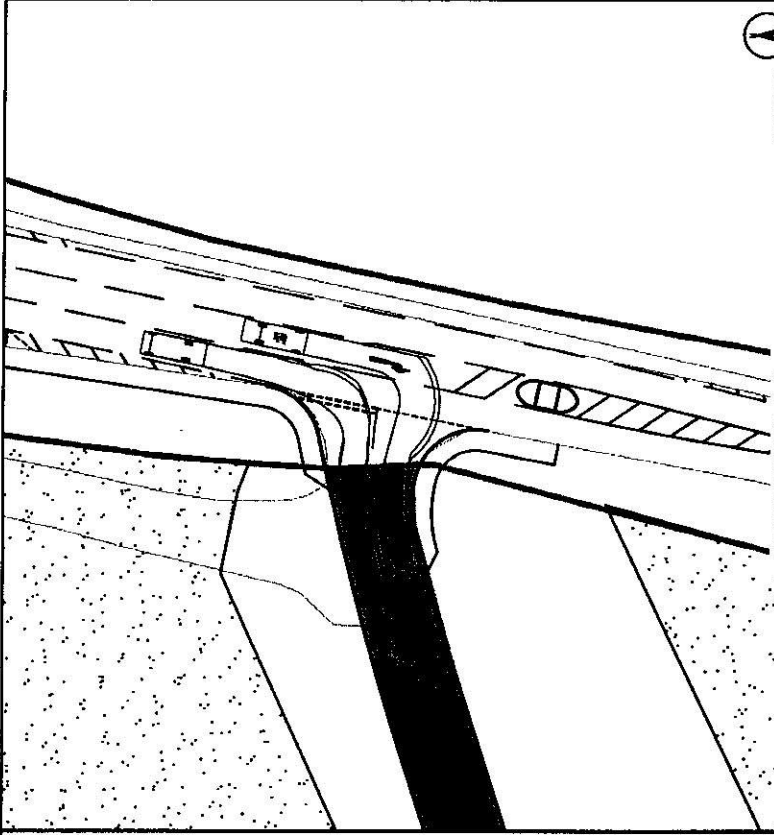
Project Suffolk Greenhouses

Title Preliminary access proposals, Northern Greenhouse

Drawing Status For Information
 Drawing Size A3
 Date Created 28-08-13
 Project Leader DA
 Drawing Scale As Shown
 Initial Review SM

Drawing Number JNY7963-02
 Rev A

Transport

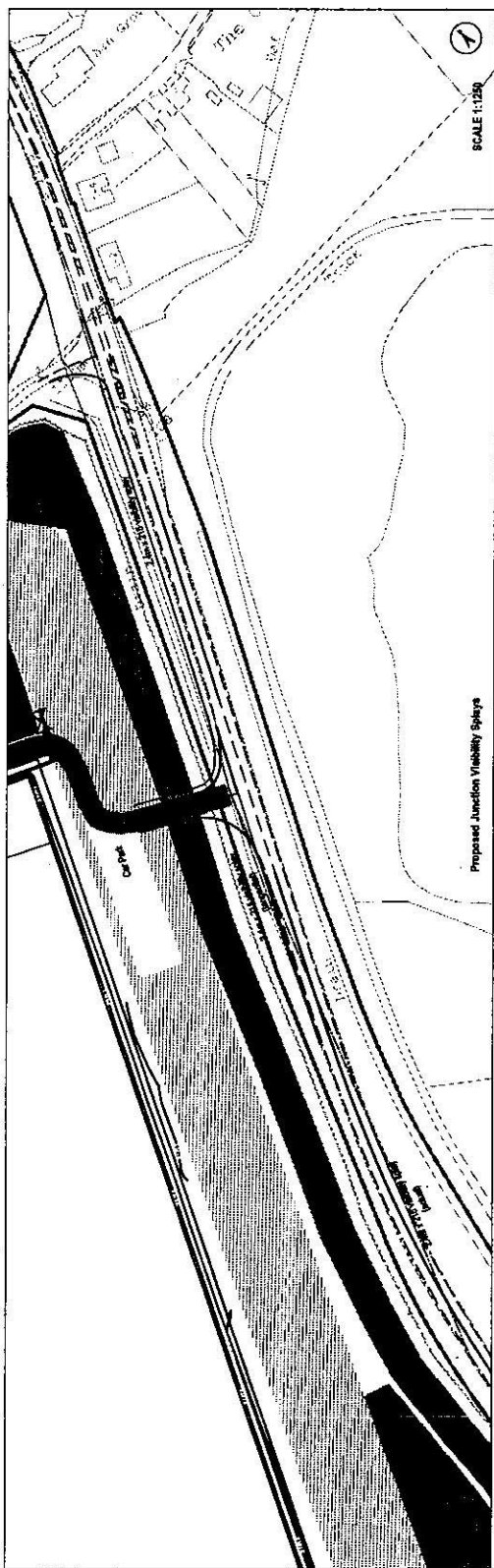
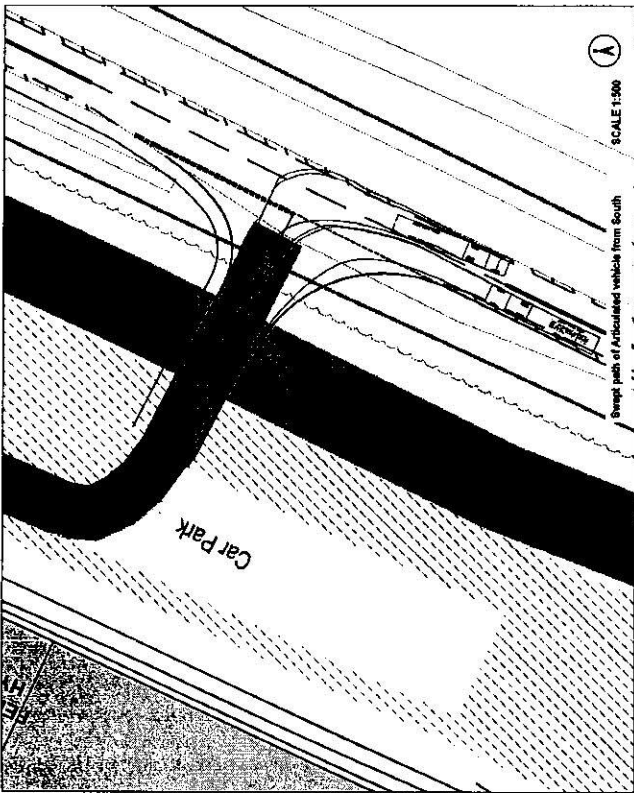
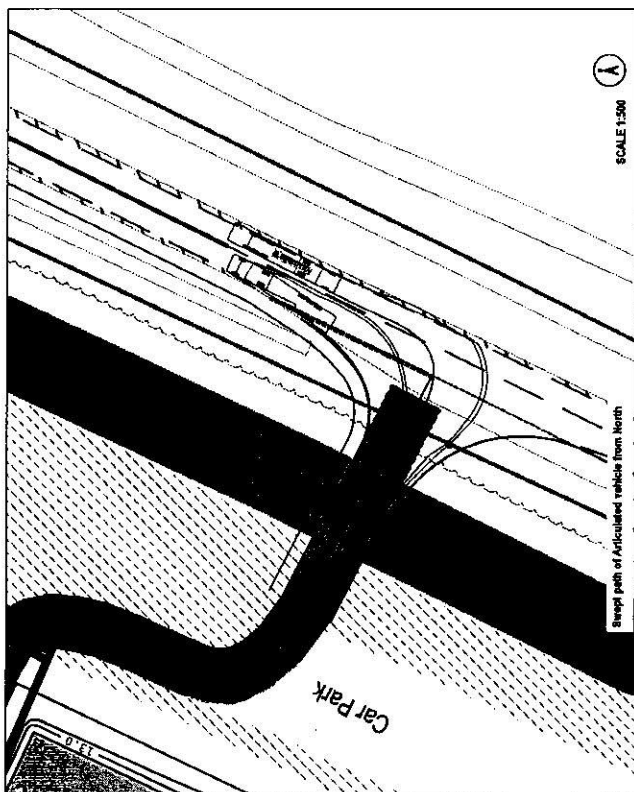
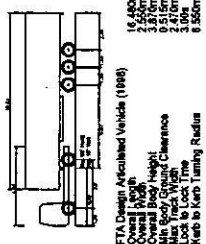


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3. This drawing should be read in conjunction with all other relevant drawings and specifications.

KEY

- Highway boundary
- Angle one red line route
- Proposed layton
- Proposed tree plantation



1	Layout reviewed	DA	DA	DA	DA
2	Access updated to match other DA	DA	DA	DA	DA

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100 Client: **SITA**

100 Project: **Suffolk Greenhouse**

100 Title: **Preliminary Access Southern Greenhouse**

100 Date Issued: 20-06-15
 100 Project Number: DA
 100 Drawing Number: A2
 100 Client: B.A.
 100 Project Name: B.M.

100 Drawing Number: **JNY7963-01**

100 Rev: **B**

Transport



SPROUGHTON PARISH COUNCIL

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Your ref. 3655/13
17th April 2014

Dear Mr Isbell

Project Title: Suffolk Greenhouses at Bramford and Blakenham: Planning Application
3655/13

Project No: JNY7963

Date 19th February 2014

With reference to your letter of 25th March 2014 and your notification of your receipt of further information/revised plans received by yourself, please find the response of Sproughton Parish Council to the RPS Technical Note entitled, 'Response to SCC Highways Consultation Response.

The comments set out below relate to paragraphs 1 to 5 on pages 7 to 9 in the applicant's 'Response to Sproughton Parish Council consultation response'

Paragraph 1

The Applicant's response is noted, but Sproughton Parish Council (SPC) contends that there is a current problem with some HGV drivers not observing the existing advisory signs for the 7.5 tonne weight restrictions on the B1113 (there is a Lorry Watch scheme in operation at Sproughton). SPC believes that as journeys would be broken while loading takes place at the site, there would be a greater likelihood of HGV drivers forgetting the 7.5 tonne weight restrictions when departing the site. The erection of the necessary signage at the exit should serve to reinforce this restriction.



Paragraph 2

The Applicant's response is noted, but SPC believe the connection between the operator arranging transport of tomatoes and the applicant is not evident. The applicant has not explained what control the applicant has over the operator's activities so that "all export vehicles will be HGVs and will not legally be able to route south through Bramford and Sproughton". The applicant has also not explained how the expected 3 tonnes average weight of each export load would make full use of all of the capacity of the export HGVs.

Paragraph 3

The Applicant's response is noted, but SPC contends that the work undertaken within the applicant's submitted Transport Statement and its conclusion relate to the junctions adjacent the proposed development site. The applicant's Transport Statement has made no assessment of development impacts in Sproughton Village, and reaches no conclusion on the mitigation measures required here.

Paragraph 4

SPC notes in the Applicant's response that the further analysis of driving times using online software has not been provided by the applicant in their transport assessment. Scrutiny of the further analysis is not therefore possible. SCC Highway Officers have yet to state whether they are comfortable with the analysis.

Paragraph 5

SPC notes in the applicant's response that the quotation from the Department for Transport's 'Guidance on Transport Assessment' is taken from the document's APPENDIX B, titled 'Indicative thresholds for transport assessments' under the heading 'Thresholds based on other considerations'. SPC believes that in this case the guidance indicates a Transport Assessment is required as the proposed development is one generating 30 or more two-way vehicle movements in any hour, and one generating 100 or more two-way vehicle movements per day.

The Guidance on Transport Assessment (2007) under 'Preparing a transport assessment, TRANSPORT IMPACTS AND MITIGATION MEASURES', in Paragraph 4.92 states "If the TA confirms that a development will have material impact on the highway network, the level of impact at all critical locations on the network should be established. A particular example of material impact would be a worsening of congestion. In congested areas, the percentage traffic impact that is considered significant or detrimental to the network may be relatively low (possibly below the average daily variation in flow), and should have been determined in discussions with the relevant highway authorities. For



the avoidance of doubt, the 1994 guidance regarding the assessment thresholds of 10 per cent and 5 per cent levels of development traffic relative to background traffic is no longer deemed an acceptable mechanism, since it creates an incentive in favour of locating development where high levels of background traffic already exist”.

The applicant's transport assessment has not established the level of impact at the junction of Lower Street and the B1113 in Sproughton. The level of impact at this junction is entirely dependent upon the 3:1 north/south split in traffic assumed by the applicant. Were the split reversed (and the applicant has offered no evidence as to why it would not), the impact at the junction in Sproughton Village would be magnified by a factor of three.

Yours sincerely

S Frankis

Mrs S Frankis

Clerk to the Parish of Sproughton

cc SCC Highways

Planning Application 3655/13 –**Glasshouses - Lower Dairy Farm, Bramford (Also part in the Parishes of Great & Little Blakenham)****Submission from Planning Policy**

In the absence of PDR this is development in the countryside potentially allowable under Core Strategy Policy CS2 both as agriculture and as an employment generating proposal subject to strategic, environmental or operational justification. In the latter case strategic justification is offered through the contribution to rectifying the home-grown food deficit, the utilisation of a source of cheap waste heat nearby and the potential for more than 200 full-time jobs. There is operational justification from the accessibility to the A14 and a large residential population on the doorstep, many of whom might benefit from the flexible hours available in this type of work.

This is an agricultural proposal that involves food production on an industrial scale and style and it seems pertinent that it should be considered against policies relevant to the impacts arising from a commercial type of development. As an agricultural building Policies CL12, 13 and 14 apply but it would also seem reasonable to consider Local Plan Policies E10 and E12 for new commercial development in the countryside.

The impacts requiring consideration within policies E10 and E12 appear to be covered within the comprehensive supporting evidence presented with the application.

The proposal should be considered on its merits and in the light of the evidence presented as to whether the perceived benefits outweigh the potential harm.

David McHardy

Spatial Planning Policy Officer

17th January 2014

From: David McHardy [mailto:David.McHardy@midsuffolk.gov.uk]
Sent: 17 January 2014 17:33
To: Truscott, Elizabeth
Subject: Glasshouses 3655/13 - is this helpful?

Hi Libby

I have attached an unrequested submission from policy in relation to the Glasshouses, which you are welcome to use if it is helpful but please ignore if it is not.

Noting the representations to the effect that although this is agricultural its characteristics are closer to commercial, the general gist of the submission is that:

- a). it might be pertinent to consider the proposal against the requirements of CS2 & LP Policies E10 and E12
- b). The supporting evidence submitted covers the issues raised in those employment policies – ie this is the evidence we would have required if it was classified as commercial.
- c). NPPF requires consideration of harm vs benefit on the evidence submitted.

PS: Have you sent invitations to me and Dawn re meeting with St James folk as discussed?

Kind Regards

David

David McHardy
Planning Policy Officer - Spatial Planning Policy
Mid Suffolk District Council
131 High Street, Needham Market
Ipswich, Suffolk
IP6 8DL
Tel: 01449 - 724845
Email: david.mchardy@midsuffolk.gov.uk

Notification of Consultation on Planning Application

FROM: Professional Lead - Planning
TO: Economic Strategy Officer
OUR REF: 3655 / 13 / FUL
DATE: 08/01/2014

CASE OFFICER: Elizabeth Truscott

PROPOSAL: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy From Waste Plant and the diversion of a Public Right of Way
LOCATION: Lower Dairy Farm, Bramford (Also part in the Parishes of Great & Little Blakenham)
Site Area
44.89 Hectares

Please let me have your observations on the above proposal within 21 days.

Elizabeth Truscott

This project is an opportunity to utilise the constant supply of hot water that will produced from the nearby Energy from Waste facility once it is operational . The construction of the greenhouses will have not only a local benefit in the creation of the equivalent of 246 new full time jobs, but also a national economic benefit in the growing of tomatoes for UK consumption. This will significantly reduce the carbon footprint, cost and 'food miles' travelled by tomatoes from their place of origin to the supermarkets as currently many tomatoes are grown overseas and flown in to the UK. The positioning of the greenhouses close to junction 52 of the A14 will enable the quick transportation of the produce to the supermarket distribution centres. The introduction of the hot water pipeline to Greenhouses will also facilitate the development of St James Business Park at Gt Blakenham, which is in the Greater Ipswich Location. This is identified in the Suffolk Growth Strategy as a key site to support economic growth and attract inward investment for the county. Agriculture and food production are also highlighted in the Suffolk Growth Strategy as a key growth sector for the county with increasing demand for high quality, locally grown produce. The growing of tomatoes, the location of the greenhouses and the introduction of new jobs will all have a positive impact on the local economy, I, therefore support the application.
Dawn Easter, Economic Development Officer
16 January 2014

Consultee Comments for application 3655/13

Application Summary

Application Number: 3655/13

Address: Land at Dairy Farm, Loraine Way, Bramford

Proposal: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy From Waste Plant and the diversion of a Public Right of Way

Case Officer: Elizabeth Truscott

Consultee Details

Name: Mrs Claire Lee

Address: The Parish Room, Ship Lane, Bramford IP8 4AN

Email: bramfordparishcouncil@btinternet.com

On Behalf Of: Bramford Parish Clerk

Comments

Bramford Parish Council supports this scheme as it aims to deliver sustainable construction with local economic, social and environmental benefits in line with planning policy.

We request confirmation that local residential amenity will be protected and local employment will be encouraged.

Consultee Comments for application 3655/13

Application Summary

Application Number: 3655/13

Address: Land at Dairy Farm, Loraine Way, Bramford

Proposal: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy From Waste Plant and the diversion of a Public Right of Way

Case Officer: Elizabeth Truscott

Consultee Details

Name: Mrs Janet Clarke

Address: 7 Drury Road, Claydon, Ipswich IP6 0ED

Email: pc@somersham.suffolk.gov.uk

On Behalf Of: Somersham Parish Clerk

Comments

Somersham Parish Council considered this application at its January meeting and had no objections to the proposal as outlined.

Consultee Comments for application 3655/13

Application Summary

Application Number: 3655/13

Address: Land at Dairy Farm, Loraine Way, Bramford

Proposal: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy From Waste Plant and the diversion of a Public Right of Way

Case Officer: Elizabeth Truscott

Consultee Details

Name: Mrs Claire Lee

Address: Gipping Lodge, Ship Lane, Bramford IP8 4AL

Email: greatblakenhampc@btinternet.com

On Behalf Of: Great Blakenham Parish Clerk

Comments

In supporting this application Great Blakenham Parish Council acknowledges that the application will deliver sustainable development with benefits for the local economy and environment, within planning policy.

Place Directorate

Responsible for the Economy
and the Environment



Christine Thurlow DipEnvP MRTPI
Corporate Manager - Development Management

Mid Suffolk District Council
Needham Market
Ipswich
Suffolk
IP6 8DL

Our Ref: **BIE/14/00029/ENQ**
Ask for: **Christine Thurlow**
Phone: **01473 825860**
Fax: **01473 825708**
Email: **planning.control@babergh.gov.uk**

Date: 20 January 2014

Dear Ms Truscott,

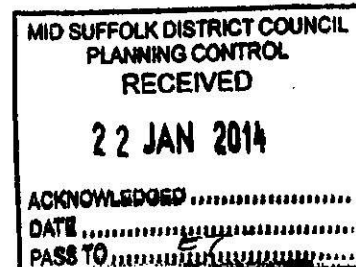
Application No: 3655/13
Location: Lower Dairy Farm, Bramford
Proposal: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy From Waste Plant and the diversion of a Public Right of Way

Thank you for consulting Babergh District Council as adjoining Local Planning Authority on the above application.

The application details have been viewed on your website and Babergh District Council has no representations to make on the proposed siting, scale and appearance of the development. It is considered that impacts resulting from the proposal will be localised within the Mid Suffolk District, and appropriate conditions may be imposed by MSDC to mitigate impacts. Furthermore, the visual impact of the proposal on the Special Landscape Area and wider landscape as viewed from the Babergh District will be limited by existing landform and vegetation.

Yours sincerely,

Christine Thurlow
Corporate Manager - Development Management.



Your Ref: MS/3655/13
 Our Ref: 570\CON\0047\14
 Date: 31 January 2014
 Enquiries to: PeterBlack
 Tel: 01473 265191
 Email: peter.black@suffolk.gov.uk

The District Planning Officer
 Mid Suffolk District Council
 Council Offices
 131 High Street
 Needham Market
 Ipswich
 Suffolk
 IP6 8DL

For the Attention of: Elizabeth Truscott

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990
 CONSULTATION RETURN MS/3655/13**

PROPOSAL: **Erection of two greenhouses, associated ancillary infrastructure,
 provision of a pipeline to the Great Blakenham Energy From Waste
 Plant and the diversion of a Public Right of Way**

LOCATION: **Lower Dairy Farm, Loraine Way, Bramford, Ipswich, Suffolk**

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority make the following comments:

2.15 – Future transport improvements are unlikely to be implemented within the time scales for this application.

2.21 – There has been 4 accidents at the Pound Lane junction with 2 of them attributed to turning right into Pound Lane. Can the detailed accident data be provided for all identified accidents?

3.5 – Appendix G only shows HGV exports and not staff numbers. Is the staff numbers different to that shown in appendix R?

3.11 – How do HGV's enter, turn and leave the northern greenhouse? No diagram to show that this can safely be done.

3.24 – Local flooding at the southern access will need to be addressed in the s278 agreement.

3.27 to 3.30

We would like to see the speed limit reduced to 40mph from just south of the development site to the traffic lights, exact positions to be agreed as part of the TRO process. Improve the visibility splay from Pound Lane by cutting back vegetation.

Pound Lane junction to be improved with the provision of a 6 or 8m radii to reduce the width to deter vehicles using the junction to turn in. The hatching at Pound Lane should remain as existing,

as providing a designated lane for a vehicle to sit fully within it is probably not possible, therefore only advisory arrow with the buff surfacing should be provided.

Cycle/footway links – Provide the northern cycle link as shown on the plan. For the southern link, retain the use of the dual carriageway section (we are apprehensive with regards to the added maintenance of the hatching and layout of the junction / carriageway) and improve the link through the carriageway running past Broomvale Business Park – this may involve upgrading the footway to a shared facility.

Edge Lines / Central Islands - Looking at the proposals for the B1113 we have concerns over the use of edge hatching, preferably we would want edge lines installed approx 1.0m away from the road edge which will give the same narrowing effect. This could be accompanied with a thin central hatch (0.5 – 1.0m) and a double white line system.

The central refuge islands will need to be 2m in width. We are not sure that they can be accommodated within the existing carriageway width. Measurements required.

Bus Stops - Upgrade the existing bus stop locations and facilities to ensure they are easily accessible and safe for workers to use. Upgrade bus stop lay-by and relocate bus stop for buses travelling Claydon bound.

3.35 – No swept path drawings available to make comment on. Please provide?

3.38 – The tunnel under Pound Lane will need approval from our structures team.

5.27 – I assume that the traffic flow data shown in appendix Q relates to traffic on Bramford Rd outside the greenhouses, please confirm?

5.38 – Where do these figures come from? What is the justification for 40% of staff arriving by minibus, 10% by bus, 5% walking or cycling and 10% as car share?

Table 5.2 – Do not agree with these figures as it shows 55% of staff are non-car drivers. What is the evidence to support this?

Table 5.3 – As above

There is no provision for visitor parking. There appears to be a shortage of parking spaces on site that will lead to indiscriminate parking with possible queuing back onto the highway or possibly parking on the highway verges. There is no motorcycle parking provision.

What will be the method of pedestrian movement between greenhouses? Are you expecting managers to drive from 1 site to the other?

Can you give the rationale behind the traffic flow data and the direction for traffic movements as shown in appendix P?

Yours faithfully

Mr Peter Black
Development Management Engineer
Highway Network Improvement Services
Economy, Skills & Environment

Your Ref: MS/3655/13
Our Ref: 570\CON\0047\14
Date: 22 April 2014
Enquiries to: PeterBlack
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Email: peter.black@suffolk.gov.uk



The District Planning Officer
Mid Suffolk District Council
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131 High Street
Needham Market
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For the Attention of: Elizabeth Truscott

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/3655/13**

PROPOSAL: **Erection of two greenhouses, associated ancillary infrastructure,
provision of a pipeline to the Great Blakenham Energy From Waste
Plant and the diversion of a Public Right of Way**

LOCATION: **Lower Dairy Farm, Loraine Way, Bramford, Ipswich, Suffolk**

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority make the following comments:

Paragraph 2.21

I accept that the accident statistics at this junction do not in themselves warrant an improvement to this junction however, with this development there will be an increase in traffic movements and likely turning into Pound Lane, and therefore improvements to the Pound Lane junction is required.

Paragraph 3.11

The swept path for the northern access is not acceptable. The drawing shows that a lorry exiting the site will completely block the access. It also shows that the lorry will use the right turn lane which could lead to head on collisions. If there is a vehicle waiting to turn right into the site and a lorry is exiting, one of the vehicles will have to reverse to allow the vehicles to pass. This is a safety concern that is not acceptable.

Paragraphs 3.27 to 3.30

The southern access is within the 60mph speed limit. With the number of movements associated with this development we would want to see the speed limit reduced. We would be looking to the developer to pay for the required TRO, although we accept there is no guarantee of its outcome.

Although there may not be a big increase in the development traffic using Pound Lane there will be an increase in traffic on Lorraine Way. There may also be an increase in vehicles using Pound Lane to turn around in, as currently happens, to get back to the northern access. We would want to see the improvements we suggested to this junction implemented as part of this development.

The pedestrian island shown as part of your improvement is not acceptable. It is too narrow and any pedestrian standing on it with HGV's going past would feel very vulnerable.

The proposed hatching on the southern side of the dual carriageway is not acceptable. This could lead to vehicles undertaking if a slow moving vehicle is encountered. We would want to retain this section of road as 2 lanes so that there is an opportunity for vehicles to overtake.

The cycleway on the southern side may need to be upgraded to a shared path.

The pedestrian island at the northern access has no dimensions. These need to be provided for comment.

You have stated that you are willing to make a contribution for delivery of some of these elements. Can you confirm what elements you are willing to fund or provide an amount you are willing to provide?

Paragraph 3.35

The swept path for the northern access, see comments above under 3.11. The swept path for the southern access onto Lorraine Way is not shown on the latest plan but is shown on JNY7963-01, albeit that you show vehicles exiting and entering from the south which should not happen. Have there been any changes that will affect this swept path.

Paragraph 3.38

A detailed design will be required and this will be dealt with under the s278 agreement.

Paragraph 5.38, Table 5.2 and Table 5.3

The applicant will need to provide evidence to support this statement. My estimate is that 85% of the workers will arrive by car. There are other seasonal type operations where staff numbers fluctuate. Wilkin and Son in Tiptree, Aspell Cyder in Debenham are 2 that come to mind that have an increase in seasonal pickers.

The site is not in a sustainable location and unlikely to attract many walkers, cyclists and bus travellers.

General

You are saying that there will be no visitors to the site, what about maintenance vehicles or prospective buyers. There should be provision for some visitor spaces on site.

My main concerns are the insufficient parking provision on site and the safety aspects of the local highway with the increase in traffic movements.

Yours faithfully

Mr Peter Black
Development Management Engineer
Highway Network Improvement Services
Economy, Skills & Environment