

MID SUFFOLK DISTRICT COUNCIL
PLANNING COMMITTEE - 21 May 2014

AGENDA ITEM NO 1
APPLICATION NO 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
SITE LOCATION Land at Dairy Farm, Loraine Way, Bramford
SITE AREA (Ha) 44.89
APPLICANT Ms E Smyth
SITA UK
RECEIVED December 19, 2013
EXPIRY DATE March 21, 2014

REASONS FOR REFERENCE TO COMMITTEE

The application is referred to Planning Committee for the following reasons :

- (1) Two Members of the Council have a landowning interest in the site.
- (2) Your Corporate Manager has requested that the Chairman of the Development Control Committee agree that this application be reported straight to Planning Committee having regard to the location, scale and strategic nature of the application and in the interests of transparency, this has been agreed.

PRE-APPLICATION ADVICE

1. Extensive pre-application discussions took place in relation to the proposal. It was confirmed that the principle of the development, which is considered to be agricultural, is acceptable. That key issues in relation to the development would be landscape, highways and economic benefits.

The application is subject to a Planning Performance Agreement. A Screening Opinion has been issued for the purposes of EIA regulation and it has been determined that an EIA is not required.

SITE AND SURROUNDINGS

2. The site occupies 44.98 hectares to the west of the B1113. The site is within the parishes of Bramford, Little Blakenham and Great Blakenham. Overall the site gently slopes down from west to east. The site comprises two separate

areas divided by Pound Lane which lies east to west from the B1113 to Little Blakenham.

The northern part of the site comprises two fields bisected by a track, with a line of Poplar trees along it. This part of the site is surrounded by a mature belt of trees on the eastern boundary and also along the northern and western boundaries of the most northerly field. A public footpath exists on the northern part of the site.

The southern part of the site comprises agricultural land, this is currently mainly used for arable cultivation, but on the most southerly part of the site, there is a small retail nursery use with various sheds, poly tunnels and a car park. There is also a large agricultural building on the southern boundary of the site and three ponds on the boundary of the southern part of the site.

To the north of the site is an area of overgrown agricultural land, beyond which lies the Orion Business Park. To the east of the site, along the B1113 are a number of residential and commercial properties which form loose clusters of Broomvale Farm and The Common. To the south of the site are residential dwellings 1, 2 and 3 Lower Dairy Farm, which adjoin the nursery and to the west further agricultural fields and a quarry.

The site is classified as grade 2 agricultural land. The nearest listed buildings are: the Grade II Broomvale Farm and associated buildings which are located on the opposite side of the B1113 to the site; to the west of the site is the Little Blakenham Pit; and to the east of the site is the Suffolk Water Park both of which are County Wildlife Sites. Land to the east of the site is part of the Gipping Valley Special Landscape Area.

HISTORY

3. The planning history relevant to the application site is:

0785/13	Screening Opinion request for the development of two greenhouses to be heated from the Great Blakenham Energy from Waste (EfW) facility, the implementation of a pipeline between the EfW facility and the greenhouses and the diversion of Public Footpath No. 21	EIA not required 08/04/2013
1219/10	Erection of general purpose agricultural building	Granted 09/06/2010
0966/09	Erection of building to store grain and machinery.	Refused 29/05/2009
0878/09	Extend time permitted for mineral extraction and site restoration by 4 years, i.e extraction to 2013, restoration to 2017; (Variation of condition 1 of planning permission MS/1531/05), including aftercare	Granted 07/04/2009

proposals for afteruse of the whole site to woodland Plantation.

PROPOSAL

4. The proposal is for the erection of two greenhouses, associated ancillary infrastructure, provision of a hot water pipeline to the Great Blakenham Energy From Waste Plant (EFW) and the diversion of a Public Right of Way.

The greenhouses would be used to grow tomatoes utilising waste heat recovered from the nearby Energy from Waste facility. The crops would partly be grown under lights, allowing year round production. Currently the UK tomato industry accounts for only 17% of all tomatoes consumed in the UK, with the rest being imported. There is additional demand for UK grown tomatoes, part of which would be satisfied if this proposal was accepted.

The development would be split by Pound Lane, with the southern greenhouse to the south of Pound Lane and the northern greenhouse to the north of Pound Lane. The southern greenhouse would measure 83,880m² and the northern greenhouse would measure 81,640m². The greenhouses are approximately 500m long by 200m wide, with a height of 7m to the ridge. The northern greenhouse would be built with a finished floor level at 1 metre higher than the southern greenhouse. Two new accesses would be created off the B1113 to the northern and southern greenhouse. It is also proposed to create a tunnel under Pound Lane between the two sites.

Two lagoons would be built to take rain water from the greenhouses; one to the rear of the northern greenhouse; and one to the side of the southern greenhouse. This rain water would be reused to irrigate the tomato crop. The three ponds already in situ on the boundaries of the southern part of the site would remain, with the larger two being improved to provide habitat for Great Crested Newts. The pipe line from the Energy from Waste plant would pass along the B1113, then into the corner of the northern site and under Pound Lane to the southern greenhouse. Retention walls would be required along parts of the greenhouses due to changes in land levels across the site.

Much of the existing landscaping surrounding the northern greenhouse would be retained, while new planting will take place along the boundaries of the site. Parking would be provided for both the north and south greenhouses, this would comprise 42 parking spaces on the northern greenhouses and 56 parking spaces on the southern greenhouses. Cycle shelters would be provided on both sites. The area not occupied by buildings or lagoons will be retained as grassland, with the land to the rear of the greenhouses becoming calcicous grassland habitat.

Within the southern greenhouse would be the majority of the ancillary facilities, including a cold store and packing areas, energy centre and offices. Both greenhouses would also provide facilities for staff.

The existing footpath which bisects the northern part of the site, following an agricultural track, would be replaced by a re-routed public footpath which would

skirt around the edge of the field through a wooded area and come out onto Bramford Road close to the public right of way on the other side of road. In addition, there would be a permissive footpath which would provide access to the public right of way via the entrance to the northern Greenhouse.

POLICY

5. Planning Policy Guidance

See Appendix below.

CONSULTATIONS

6. Bramford Parish Clerk

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.

Great Blakenham Parish Council

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.

Little Blakenham Parish Council

Object to the proposals due to the following reasons:

- volume and speed of traffic past the end of Pound Lane
- Visual impact, height of bunding, light and reflection
- Flooding. There does not appear to be any facility for the overflow of the lagoons.
- Concerns over the amount of staff parking, toilet facilities and the footpath from the bus stop.
- The packing facility should be moved to the north of the site with access off the dual carriageway opposite the Business Park. This would be to avoid traffic going past the accident black-spot at the end of Pound Lane.

Somersham Parish Council

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

Sproughton Parish Council

Concerns raised regarding additional traffic travelling through Sproughton Village.

Fire Service Hq - County Fire Officer

Thank you for your letter dated 8/1/2014. We have no issues with this application and will not be making formal comment.

NATS Safeguarding Office

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

Natural England

No objection and no conditions requested

This application is in close proximity to the Little Blakenham Pit Site of Special Scientific Interest (SSSI) and Great Blakenham Pit SSSI. Natural England is satisfied that the proposed development if carried out in strict accordance with the details of the application as submitted, will not damage or destroy the interest features for which the sites referred to have been designated.

MSDC - Conservation Officer

At 500m x 200m x 7m high these buildings represent substantial agricultural intensification and will have a major impact upon the character of the surrounding open countryside.

The area is not rich in listed buildings, the majority of these buildings are some distance from the proposal site and their setting will not be directly affected.

Listed buildings at Broomvale Farmhouse and Broomvale Business Centre (agricultural buildings formerly associated with Broomvale Farmhouse) are close to the North East boundary of the proposal site, and views to and from the listed buildings are likely to be affected by this proposal. The measures put forward both to maintain and strengthen existing hedgerow screening are to be welcomed.

MSDC Economic Strategy

The construction of the greenhouses will have not only a local benefit in the creation of the equivalent of 246 new 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. 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 the 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.

Agricultural and food production are key growth sectors for the county. The growing of tomatoes, the location of the greenhouses and the introduction of new jobs will have a positive impact on the local economy, I therefore support the application.

Highways Agency

The proposed development generates relatively low numbers of trips onto the road network and the impact on J52 of the A14 is considered to be minimal.

MSDC - Planning Policy

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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.

MSDC - Tree Officer

I have no objections in principle to this application although some additional/missing information is still required.

Whilst some trees are proposed for removal, they are generally lower quality specimens and the overall impact should be negligible in landscape and amenity terms. This should be adequately compensated by new planting as part of the landscape plan although these details will need to be agreed.

I note reference to a Tree Protection Plan (TPP) within the arboricultural report (para. 6.7), but cannot find this in the file; it will be crucial considering the importance of some of the trees on site. This will need to be supplemented by an arboricultural monitoring schedule, in order to help prevent/minimise any detrimental impact to the trees.

Once this information has been submitted and agreed, the development should then be undertaken in accordance with these details using an appropriate condition.

Babergh District Council

Has no representations to make on the proposed siting, scale and appearance of the development. It is considered that the impact of the scheme will be localised within the Mid Suffolk District. 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.

SCC Flood & Water Management

I write to advise you of the following concerns we have:-

- The position of the attenuation basin on the slope above the development, poses a flood risk if it over tops or fails structurally

- How will the discharge out of the basins be managed to maintain the existing greenfield run off rate hydrobrake?
- What filtration system is proposed for the surface water before it is discharged into the watercourse?
- Has the applicant ensured that the surface water discharge is WFD compliant?
- Has the applicant ensured that the site can accommodate 1:30 and 1:100 year plus climate change storm events?

Ramblers Association

The Footpath Committee of Stowmarket Ramblers have viewed this application & walked the proposed path diversion. The enjoyment of walking footpath no.21 will be greatly affected by the height of the northern greenhouse when coming from Lt. Blakenham and especially where it passes the old packhouse.

The route of the diversion must be of adequate width and screened from the greenhouse. Where the proposed path joins the very busy B1113 it must be well sign posted as well as the promised permissive path, running parallel to this road, be constructed before major development work commences.

MSDC - Environmental Health

I am broadly satisfied with the air quality impact assessment and do not think that it should prevent the development from progressing. We would welcome discussions at an early stage regarding the construction phase emissions monitoring requirements as set out in the report.

Environment Agency

The development sites lies in Flood Zone 1 which is the area of low flood probability, but the applicant has provided a Flood Risk Assessment which is considered to be unacceptable. The principle of appropriate management of surface water has not been fully established. The submitted FRA and Drainage Strategy is unacceptable as amongst other items it fails to provide an appropriate assessment of the impacts of climate change and a clear assessment of the principle of appropriate management of surface water.

Subsequent comments

We support the undertaking of onsite percolation tests, undertaken in accordance with BRE365, and subsequent Windes modelling. Once we have received this additional information we can then re-consider our position.

SCC - Highway

The County Council as Highway Authority make the following comments:

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

- Appendix G only shows HGV exports and not staff numbers. Is the staff numbers different to that shown in appendix R?
- How do HGV's enter, turn and leave the northern greenhouse? No diagram to show that this can safely be done.
- Local flooding at the southern access will need to be addressed in the s278 agreement.
- 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.
- No swept path drawings available to make comment on. Please provide?
- The tunnel under Pound Lane will need approval from our structures team.
- I assume that the traffic flow data shown in appendix Q relates to traffic on Bramford Rd outside the greenhouses, please confirm?
- 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?
- Do not agree with these figures as it shows 55% of staff are non-car drivers. What is the evidence to support this?

- 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?

Subsequent comments

- 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 Land, and therefore improvements to the Pound Lane junction is required.
- 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.
- 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 you 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?

- 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.
- The applicant will need to provide evidence to support this statement (i.e how staff arrive at work). 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, Aspoll 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

Suffolk Wildlife Trust

The ecological consultant's identify a number of potential impacts that could result from the proposed scheme and identify a number of mitigation and compensation measures that should be implemented in full, via a condition of planning consent, should permission be granted. Survey work at the site identified that Pound Lane and the northern site boundary, were particularly important commuting and/or foraging routes for bats, and it is essential that these remain unaffected by the proposed development, both during construction and in operation. It is unclear what level of operational lighting is proposed at the site. Increased lighting has the potential to have a significant adverse impact on species such as bats. It should be ensured that the development does not result in an increase in light levels at either the existing or proposed vegetation, especially along Pound Lane or the northern site boundary. We suggest that the level of lighting required is clarified, the production of a light spill plan (LUX diagram) may be helpful in determining whether the proposed development is likely to result in a significant increase in light levels.

In addition to the impacts identified in the ecological survey report, the proposed greenhouses have the potential to result in the loss of nesting habitat for skylarks. We suggest that the opportunity for the creation of new nesting habitat, through the provision of nest plots on nearby arable land, is explored as part of this proposal.

The provision of areas of new habitat is proposed as part of the scheme, both as compensation for habitat loss and as enhancement of the site. We recommend that the implementation methods and long term management measures for these areas are included in an ecological management plan for the site. Should permission be granted, such a plan should be provided prior to the commencement of any works on site, including any vegetation clearance.

SCC - Landscaping

The proposal will lead to the modification of some landscape features, for example the loss of Poplar trees to accommodate the northern glasshouse and creation of the access to the northern glasshouse. The proposal will also lead to a significant change of land cover, from arable land to horticulture. While the scale of the proposed change in land use is without precedent locally, I suggest this type of horticultural activity could not be deemed to be significantly alien or unexpected in this rural environment. It appears likely that the proposal will have some limited visual impacts on receptors within the SLA, but no direct impacts on its character or special qualities.

There appear to be significant risks to, landscape features, in particular existing tree belts, associated with this proposal. The proposed ground level changes are very close to the tree belts at the northern end of the site, and the pipeline route appears to present significant risks to a line of mature Elm trees.

The visual impacts

It is notable that visual impacts of the proposal experienced from the south cannot be wholly mitigated by the proposed planting scheme. This is as a result of the fact that the viewer overlooks the site and comprehensive screening planting cannot be achieved because of the requirements of the East Anglia Offshore Wind cable route.

The local visual impacts, from the B1113 for example, will be of a significant magnitude, particularly prior to the establishment of the planting scheme. More distant views of the site will be available from the higher land to the east of Claydon.

The proposal will also create a significant change in the outlook of some residential properties, *for example* Nos. 1, 2 and 3 Lower Dairy Farm Cottages. The glass houses are between 80-130m from these dwellings and closer to the sides of the lagoon. The applicant has proposed mitigation planting, hedge and trees, to address this issue and in addition No.3 is partially screened from the site by existing vegetation. However, it is clear that there will be significant changes in the character of the outlook from these properties which will not be ameliorated rapidly, as the vegetation will take time to mature. Therefore it is essential that the mitigation proposals in this area are effectively delivered.

Subject to conditions and an effective and detailed scheme of mitigation, it appears that the proposal appears to acceptable in landscape terms.

SCC - Ecology

I consider that the following potential impacts have not been adequately covered by the ecological assessment:

- Farmland specialists such as Skylarks and Hares (both priority (BAP) species
- Given the proximity of Bramford Water Park CWS, water birds may confuse large areas of glass with water.
- It is also likely that there will be indirect and cumulative impacts eg disturbance from the installation of the East Anglia ONE cable route, which should be assessed before determination. It should be possible to rectify these omissions without additional detailed ecological surveys as long as the likely impacts are assessed.

Subsequent comments

Pleased that the farmland specialist have now been considered and skylarks plots will be provided as mitigation on farmland. I would request confirmation that this provision will be for 10 years. I am satisfied that the likelihood of impacts on waterfowl from Bramford Water County Wildlife Site and potential for cumulative impacts with EAONE cable corridor have also been considered. The Construction and Environment Management Plan should be required by planning condition.

SCC - Minerals and Waste Plan

This proposal is located within a Minerals Consultation Area, as defined within the adopted Minerals and Waste Plan. This means that, in line with Policy 5 of the Minerals Core Strategy, the Minerals Planning Authority is obliged to object to this proposal unless it can be demonstrated that the mineral resource is not of economic value, or that the mineral would be extracted before development takes place.

As noted in the planning statement, the site is principally underlain by chalk. Demand for chalk is not currently evident and the county has supplies elsewhere. On that basis, the County Council does not wish to object on minerals grounds.

SCC - Air Quality and Noise

For both noise and air quality, the only concern specific to the County Council's responsibilities would relate to traffic movements, including HGVs during construction and operation. Additional operational HGV movements at 20, two way movements (10 in and 10 out) per day are below the thresholds for assessment for both noise and air quality and the overall additional numbers of vehicle movements, including light vehicles, are not considered to be significant. The same also applies during the construction period. The County Council therefore has no concern or requirements for mitigation.

SCC - Archaeology

This major development lies in an area of high archaeological interest recorded in the County Historic Environment Record. However, the whole area has not been subject to systematic archaeological survey or assessment.

At least one ring ditch, probably the remains of a Bronze Age barrow, is recorded by air photography within the proposed development area (HER no. BLL 001). Bronze Age features have been defined by trenched evaluation adjacent to the south-west corner of the site (BRF 068). In addition, various Roman metal-detected finds have been recovered within the area.

There is high potential for the discovery of important unknown heritage assets of archaeological interest in view of its proximity to known remains and also given the landscape setting within the valley of the River Gipping. This location is topographically favourable for early occupation of all periods.

In order to establish the full archaeological implications of this area, the applicant should be required to provide for an archaeological field evaluation of the site, *prior to determination of the application*. The area cannot be properly assessed, and outline consent approved, until a preliminary archaeological evaluation has been undertaken,

in accordance with paragraphs 128 and 129 of the National Planning Policy Framework (2012) and Core Strategy Objective SO4 of the Mid Suffolk District Council Core Strategy Development Plan Document (2008).

SCC - Public Rights of Way

The proposals to divert the public right of way appear acceptable in principle, though they are subject to a separate consent from the District Council. The District Council should ensure that the landscaping and arboricultural proposals are consistent with the intention to re-route the footpath, and vice versa.

The site layout proposals must ensure that a diverted footpath can meet the following criteria:

- The Rights of Way must be a minimum of 2m in width, with a further 2m 'no planting zone' on either side of the route.
- An improvement to the ramp adjacent to the track way must be provided.
- The alignment of the Rights of Way should demonstrate consideration of the ecological and arboricultural impacts of the proposal.

MSDC - Public Rights of Way

It will be necessary to divert the footpath in order to enable the development to take place.

- The proposed route will need to be level, consolidated and unobstructed.
- The current route of the footpath passes along a wide, open track; to ensure the public enjoy the same feeling of space, where the proposed route passes through the plantation, a 2 metre wide path with a 2 metre wide no planting zone on either side is required.
- Consideration is required for the Orchids which grow on the site
- Improvements are required to the ramp adjacent to the track where the proposed route continues back onto the legal alignment.

LOCAL AND THIRD PARTY REPRESENTATIONS

7. This is a summary of the representations received.

Object

- The technology to heat the greenhouses is unproven.
- Proposal will have a detrimental impact on the landscape
- Area has already been effected by recent developments
- Development of this scale should not be so close to residential properties
- The B1113 has a poor safety record and additional accesses will be detrimental to highway safety
- Industrial type of development is unsuitable for Countryside location
- Greenhouses will lead to light pollution
- Preferable for HGVs and other delivery and collection traffic to use the northern access which is closer to the A14
- Proposed road improvements should take place before construction starts, impact on traffic and road safety during construction is likely to be worse than during plant production
- There are no arrangements to decommission the plant at the end of life

- Lack of local jobs
- Need for long term maintenance of the landscaping
- Proposal will increase the risk of flooding offsite
- The bus service is under threat of closure
- Could lead to parking along the B1113
- Lead to noise and disturbance for neighbouring properties
- Overbearing impact on neighbouring properties
- Potential for lagoon to overtop and lead to flooding of neighbouring properties
- Landscaping should be undertaken first to ensure the greenhouses are not visible during construction
- Noise from HGVs will be detrimental to the residential amenity of neighbouring properties
- Proposal will be detrimental to wildlife
- Re-routing of the footpath will make access to open countryside more difficult and the route will be less pleasant
- Ancillary and parking areas are unnecessarily close to neighbouring properties
- Levelling of site will increase the height of the greenhouses nearest to the dwellings
- Will result in increased traffic and congestion through Sproughton village

Support

- Scheme will ensure heat generated by the waste to energy plant will be utilised and maximum carbon saving will be achieved
- Land will still be used for food production
- The greenhouse will be landscaped to ensure they are screened from view
- Provide local produce with longer growing seasons
- Proposal is part of the evolving agricultural industry
- Create local employment

ASSESSMENT

8. The assessment covers the following issues:-

- (a) The principle of the development
- (b) Highways
- (c) Public Rights of Way
- (d) Surface water and flooding
- (e) Neighbour amenity
- (f) Impact on the character of the area
- (g) Ecology
- (h) Economic and sustainability benefits

The principle of the development

The Core Strategy

The site is located within the Countryside where Policy CS2 of the Mid Suffolk Core Strategy applies which states that in the Countryside development will be restricted to defined categories including: agriculture and new-build employment generating proposal where there is a strategic, environmental or operational justification. The proposal is for the use of the land for horticulture but is of the scale of an industrial or commercial type use. As such is it considered that the proposal should be considered as both agriculture

and new-build employment. The proposed greenhouses would use the surplus heat from the Energy from Waste Facility, and is therefore required to be in close proximity to the Energy from Waste Facility. The location of the greenhouses would also be close to Junction 54 of the A14, allowing for the produce grown there to be readily distributed throughout the UK. It is therefore considered that there are strategic, environmental and operational justification for the greenhouses to be at this location. The principle of the development therefore accords with Policy CS2 of the Mid Suffolk Local Plan.

Policy CS4 of the Mid Suffolk Core Strategy states that the council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere. The proposal is within a Flood Zone 1 area and the proposals include lagoons and rainwater harvesting to ensure that this does not increase flooding. Policy CS5 of the Mid Suffolk Core Strategy states that all development will maintain or enhance the environment and the district's most important components will be protected. The site does not have any landscape designations and is therefore considered appropriate for larger scale developments.

The Core Strategy Focused Review (CSFR)

The Core Strategy Focused Review (CSFR) was adopted by Full Council on 20 December 2012 and should be read as a supplement to Mid Suffolk's adopted Core Strategy (2008). This document updates some of the policies of the 2008 Core Strategy. The document does introduce new policy considerations, including Policy FC 1 - Presumption in favour of sustainable development that refers to the National Planning Policy Framework (NPPF) objectives and Policy FC 1.1 - Mid Suffolk approach to delivering Sustainable Development that provides

"development proposals will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development as interpreted and applied locally to the Mid Suffolk context through the policies and proposals of the Mid Suffolk new style Local Plan. Proposals for development must conserve and enhance the local character of the different parts of the district. They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and the policies of the Mid Suffolk Core Strategy and other relevant documents."

The development is considered to be a form of sustainable development. It is a form of agricultural development which is appropriate in the countryside and will have positive economic benefits through the provision of jobs. In addition it will use the waste heat from the Energy from Waste Facility.

Policy FC 3 of the Core Strategy Focused Review states that provision will be made for development that aims to deliver at least 8,000 additional jobs in the district by 2026. Although the site is within the Countryside, and therefore not allocated for employment purposes, it is located in the Ipswich Policy Area where new employment development is being focused. As such the proposal complies with Policy FC3.

NPPF

The National Planning Policy Framework (NPPF) was published on 27th March 2012. It provides that the NPPF "does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise".

The NPPF also provides (para 187) that *“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”*

Paragraph 28 of the NPPF states that in order to create new jobs and prosperity within rural areas, councils should take a positive approach to new sustainable development and promote the development of agricultural businesses. The proposal is considered to be a sustainable development which complies with the thrust of the NPPF.

It is considered that the scheme is overall, consistent with the policies in the Core Strategy, Core Strategy Focused Review and the NPPF in relation to agricultural development within the Countyside.

Highways

Policy T10 of the Mid Suffolk Local Plan states that the provision of safe access to and egress from the site must be considered when determining planning applications for development. The Local Highway Authority has requested further clarification and amendment of some of the proposed alterations to the highway. Any further comments from the Local Highway Authority will be provided to the Committee for consideration.

The proposal includes two accesses off the B1113, one for each greenhouse. The southern access would be a completely new access point and would be used for the majority of HGV movements, as the packing area would be located within the southern greenhouse. The northern access would be in the location of an existing access to a farm track, and would only have a low number of HGV movements related to a yearly delivery of plants. Both accesses would be used by staff, with goods being moved between the two sites by means of a tunnel under Pound Lane.

A transport assessment has been provided as part of the application; this states that due to the seasonal nature of the process, the number of staff and HGV movements will alter throughout the year. There will be 54 permanent staff, divided between 19 at the northern greenhouse and 35 at the southern greenhouse. Seasonal crop pickers will increase to a maximum of 192 in June. Between April and October there will be in excess of 100 seasonal workers on the site. There will be 2 HGV deliveries to the southern greenhouse per day, and HGV daily exports will increase to a maximum of 7 during the summer. It can therefore be concluded, that HGV movements will be relatively low and the major traffic impact will result from staff travel. During the months of November to March the number of staff on site will be relatively low with 54 permanent staff and up to 30 seasonal staff, spread over both sites and with sufficient parking spaces at each greenhouse for these staff. The major traffic impacts will be during summer when the site is at full capacity. During summer, seasonal crop pickers will work during daylight hours between 7am and 6pm. A flexi-time approach will help to ensure arrivals and departures are spread out. It is proposed to employ a permanent minibus driver who will pick up staff from nearby villages and Ipswich. The transport assessment anticipates that there will be good uptake of the free minibus service by 40% of staff. In addition 10% of staff would travel by bus, 5% walking or cycling and 10% through car sharing, with the remaining 25% driving. Car parking has been provided onsite on the basis of these figures. The provision of a minibus service will help to relieve traffic pressure on the site and ensure sustainable transport options are available for this countryside site.

The Highway Authority have questioned the likely uptake of the minibus service; they consider that it is likely that more staff will travel by car than the travel assessment has anticipated. The developer has therefore provided an additional 98 overspill parking spaces divided between the two greenhouses which will be provided on grasscrete or equivalent to prevent parking on the verges of the B1113.

As there is a 7.5 tonne weight restriction on the B1113 to the south of the site, all HGV movements will be to and from the north of the site. It is also anticipated that 75% of all staff arrivals will be from the B1113 to the north, as this provides access to the majority of Ipswich via the A14 as well as towns and villages to the north. Both site access junctions are anticipated to operate within their capacity, without leading to queuing from the B1113.

Various proposals to improve the B1113 as part of the scheme are proposed, following comments from the Local Highway Authority. These proposals have been revised to include using altering line markings to allow for turning space into the site, decreasing the radi of the Pound Lane junction to discourage its use for 'U' turns and to provide on carriageway cycle lanes between the northern access and the existing cycle lane. All these works would be subject to a section 278 agreement under the Highways Act. The Highway Authority have also requested the the developer fund a Traffic Regulation Order to decrease the speed limit on the stretch of the B1113 outside of the site from 60 to 40 mph. The developer has agreed to a £10,000 contribution which would be subject to a s106 obligation.

The transport assessment provides evidence that appropriate access and egress from the site can be provided and the proposal will not have a detrimental effect on traffic along the B1113. Subject to final comments from the Local Highway Authority, the development is considered to comply with Policy T10 of the Mid Suffolk Local Plan and paragraph 35 of the NPPF.

Public rights of way

Policy RT11 of the Mid Suffolk Local Plan states that the Council will safeguard the footpath network and where appropriate, will support proposal to secure its improvement and modification.

Currently there is a public right of way through the northern part of the site which will be required to be re-routed to enable the northern greenhouse to be built. It is proposed that the new public footpath will skirt around the edge of the field, through the existing plantation. Although the route will be slightly longer and alter from going across an open field to through more covered woodland, it will still link to the wider footway network. The proposed improvements to the B1113 will also formalise the current informal pedestrian refuge area which will allow safer crossing of the B1113 to the public right of way network to the east. The route through the plantation will also ensure that the greenhouses are hidden from view when using the re-rooted footpath. There will be some views of the northern greenhouse from the existing footpath, however additional planting will be provided in this location to soften the impact. Overall it is considered that the revised position of the footpath is acceptable and complies with Policy RT11 of the Mid Suffolk Local Plan and paragraph 75 of the NPPF, subject to exact details of the footpath.

Surface water and flooding

Policy CS4 of the Mid Suffolk Core Strategy states that the council will support development proposals that avoid areas of current and future flood risk.

The site is located in Flood Zone 1, however the loss of 44 hectares of undeveloped land, will decrease the capacity of the site to deal with rain water and could potentially have a significant effect on localised flooding, especially as the site slopes down towards the B1113. In order to cope with rainwater on the site, it is proposed to harvest the rainwater from the greenhouses roofs into two lagoons on the site. This water would be use to irrigate the tomatoes. A Flood Risk Assessment has been provided which the Environment Agency currently considers to be acceptable due to the fact that the applicant has not submitted onsite percolation tests. These will be require prior to any grant of planning permission as assumptions have been made within the Flood Risk Assessment in relation to infiltration rates which can only be confirmed by percolation tests. It is proposed that this testing will occur if a positive committee resolution is received, but prior to the issue of the decision for the application (see recommendation for details).

Neighbour amenity

A number of objections have been raised by local residents in relation to: noise; an overbearing dominant impact of the scheme, and the impact of the lighting on site.

Outlook/Dominance

The nearest properties to the development will be 1, 2 and 3 Lower Dairy Farm which will face onto the S3 lagoon and the southern greenhouse, past an existing access track. Given the difference in grounds levels, the southern greenhouse will appear to be approximately 10m in height when viewed from these dwellings. However the greenhouse will be located approximately 80 metres from the nearest dwelling and the glass structure will appear less dominant that a solid building. In addition there is already some planting to the front of the affected dwellings, and this is proposed to be significantly extended and enhanced to provide a tree plantation. No.3 Lower Dairy Farm is at a lower level than the existing track, and is one and a half storey, and as such it already has limited views across the site. While it is accepted that the outlook for these dwellings will alter significantly, given the form and location of the greenhouses, and the proposed intervening vegetation, this is not considered so detrimental as to justify refusal of the application. All the other affected dwellings and businesses are located on the opposite side of the B1113 to the northern greenhouse. There is a significant tree plantation which is around 30 metres in depth which will protect the outlook of these dwellings.

Noise

Potential noise from the site will include noise from vehicles, equipment and plant being used for the horticultural processes. The greenhouses have been designed with the plant being located to the sides of the greenhouses, close to Pound Lane and away from dwellings. As such any noise from plant will be very limited. The greenhouses will be staffed from 7.00am to 6.00pm and outside these hours any noise from vehicles will generally be limited to security staff. The relatively limited number of HGV movements and staff vehicles using the B1113 to access the site should not impact on the neighbouring dwellings due to noise, given that this is already a busy road. HGVs will use the southern access which is located away from dwelling, again reducing disturbance from the noise of vehicles undertaking manoeuvres.

Noise during construction is likely to be more disturbing, as it will involve a greater

amount of HGVs and noise on site. Given the nature of the scheme, the construction process is likely to be quicker than a conventional building. A condition relating to a construction management plan will be required to ensure that there are agreed working hours and to restrict the use of the track adjacent to the dwellings of Lower Dairy Farm.

Lighting

Parts of the greenhouses will be required to be lit at night to ensure optimum growing conditions. There will be blinds to ensure that this light is not omitted into the sky. Other lighting will need to be limited to low level lighting and motion sensitive security lighting due to the presence of bats in the vicinity. Any areas to be lit will be located away from neighbouring properties which should not be disturbed by additional lighting from the proposal. There is already some street lighting and lighting for surrounding commercial uses in the area, which will lessen the effect of any lighting on the wider landscape. Details of lighting will be required by condition.

Impact of the character of the area including landscape impact

Policy CS5 of the Mid Suffolk Core Strategy states that the council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape.

The development of 44 hectares of agricultural land into horticultural greenhouses will clearly have a significant landscape impact. The site will be visible from higher vantage points and from the B1113 and public footpath whilst the landscaping is maturing. The changes in levels required will have an additional impact on the character of the area and create a more artificial landscape. However the site is located in an area characterised by a mixture of uses, including recreational, with the Suffolk Water Park and golf course close by and industrial, including the Energy from Waste Plant and Orion Business Park. It has an urban fringe character rather than a remote countryside character and as such, additional development will be more in character with the area. In addition, the land will still be used for agriculture and the lightweight nature of the greenhouses mean it is easier for it to be assimilated into the wider landscape. The Gipping Valley Special Landscape Area, is contained by the B1113 and should not be affected by the development. In conclusion it is accepted that the proposal will have an impact on the landscape, but these impacts will be on a small scale and well contained. The introduction of new landscaping will help to mitigate these impacts and when considered in the balance with what the scheme will provide, the adverse impact is not overriding.

Listed buildings

The nearest listed buildings are part of the Broomvale Farm complex on the opposite side to the B1113. These former agricultural buildings have been converted into a business park which has already altered the setting of the surrounding listed buildings. Given the location of the greenhouses and the intervening plantation, it is not considered that the proposal will have a detrimental effect on the setting of the listed buildings.

Trees

An arboricultural assessment has been provided with the application. This concludes that the trees to be felled are of little importance. Important trees on the site, in particular a group of Elm trees located on the northern boundary will be protected, the arboricultural officer is content that the proposal will not be detrimental to the existing trees and will provide opportunities for further tree planting.

Archaeology

The site is designated as an area of being of high archaeological importance; geo-physical survey of the site has indicated that there are some areas of archeological interest within the site and initial archeological trenching of the site is required to be undertaken prior to any grant of planning permission. This will ensure that the development can be undertaken without detrimentally affecting any underlying archaeology. Subject to this initial trenching, further archaeological works can be conditioned. It is proposed that the trenching will occur if a positive committee resolution is received but prior to the decision on the application being issued (see *recommendation for details*).

Ecology

Close to the site is the Little Blakenham Pit SSSI which is an important bat hibernation roost. An ecological assessment has been provided as part of the application; this states that the majority of the habitat that would be lost to the construction of the greenhouses comprises arable land with little conservation interest. However habitat supporting two rare plants, the Common Cudweed and Hounds'-Tounge would be lost. An area of calcareous grassland would be created as mitigation for the loss of this habitat.

There are currently a number of ponds or areas of standing water on the site. These have been surveyed, but Great Crested Newts were not found, however to the west of the site is a pond in which Great Crested Newts are known to be present. It is proposed to provide two ponds for ecological purposes, given the proximity to the offsite pond these may then become colonised with Great Crested Newts. Additional habitat features such as log piles will be provided close to the new ponds to encourage Great Crested Newts.

A bat survey was undertaken, which found that significant numbers of bats are using Pound Lane and the northern field boundaries for commuting and foraging. Trees which are to be felled on the site were checked for possible bat roosts, but no evidence of bats was found. In addition however, nine bat boxes are proposed within the woodland plantation to provide alternative roosting habitat. A short section of hedgerow along Pound Lane will need to be removed to allow for the tunnel to be built. This could potentially impact on bats using Pound Lane for commuting. It is proposed that construction of the tunnel takes place outside of the timeframe for bats heading towards or dispersing from the Little Blakenham Pit hibernation site. In addition, impacts will be minimised by not lighting the construction site and providing guidance netting. Once the tunnel has been constructed, the hedge will be reinstated with native species and existing gaps within the hedge will also be planted up.

The existing arable field is likely to provide a breeding habitat for skylarks. To mitigate against this loss, six Skylarks plots are proposed on an alternative site within the same land ownership. The provision of these plots would be subject to a s.106 agreement. Concern was also raised in relation to the impact of the proposal on wildfowl from the Bramford Water County Wildlife site. As the majority of waterfowl movements occur at night, and the greenhouses will not omit any light, these will not adversely affect the navigation of birds from this site. It is considered unlikely that birds would mistake the greenhouses for areas of open water, but if they did given that the impact would be at landing speed they would be able to take off again.

The application site will provide significant mitigation for lost habitats, including the introduction of two ecology ponds, off site sky lark plots, the creation of a calcareous grassland, bat boxes within the woodland and improvements to the hedgerow along

Pound Lane. The current use of the site as arable fields provides poor quality habitat and these improvements are likely to have an overall beneficial effect on biodiversity.

Economic and sustainability benefits

Paragraph 19 of the NPPF states that the planning system should do everything it can to support sustainable economic growth, and significant weight should be placed on the need to support economic growth through the planning system. The proposal will have *significant* economic benefits. These include the creation of 54 permanent jobs and 192 seasonal crop picking jobs. In addition, the proposal will significantly increase the amount of UK tomatoes grown under glass, which currently comprises 223 hectares of tomatoes. The UK tomato industry accounts for 17% of all tomatoes consumed in the UK, with the rest imported, but there is a demonstrated demand for British tomatoes. The investment made into the site, and the production of tomatoes will have knock on benefits to the wider economy compared with imported tomatoes.

The proposal will have significant practical sustainability benefits and synergies. It will utilise heat from the Great Blakenham Energy from Waste Facility, providing a use for a potential waste product and allowing crops to be produced which will be able to compete in the market. Rainwater harvesting from the roofs of the greenhouses will be used to irrigate the tomatoes. The UK is currently a net importer of tomatoes and increasing the number of home grown tomatoes will decrease food miles for the crop. In addition there will be biodiversity enhancements on the site, including ecology ponds, a calcareous grassland habitat and additional planting.

In conclusion, it is considered that the landscape impacts on the proposal will be significant but much of these will be mitigated by the planting scheme. It is considered that any impact on the visual character of the area will be outweighed by the positive impacts on the economy, the sustainability credentials of the proposed development, and the positive impacts on biodiversity.

RECOMMENDATION

Delegate to the Corporate Manager - Development Management to determine the application within the terms set down in [a] and [b] below subject to the prior carrying out of a preliminary scheme of archaeological investigation and percolation tests which shall have been completed within 6 calendar months of the date of this resolution, or any other date mutually agreed with the Corporate Manager - Development Management and that:

[a] If the scheme of archaeological works and/or percolation tests are not undertaken within 6 months of the date of Committee (or the extended date as may be agreed) then authority be delegated to the Corporate Manager - Development Management to refuse planning permission on the basis that insufficient information has been submitted in the application to enable proper consideration of archaeological and/or flood risk impacts which may arise from the scheme and;

[b] If following the completion of the archaeological works and percolation test within 6 months (or the extended date as may be agreed), it is the recommendation of the archaeology advisers and/ or the Environment Agency that the proposed development should be granted planning permission subject to appropriate archaeological and surface water conditions, that authority be delegated to the Corporate Manager Development Management to grant planning permission, and that such permission as may be granted shall be subject to a section 106 agreement in relation to the contribution towards a TRO to

enable a decrease in road speed on the B1113 and the provision of Skylark plots. The scheme shall also be subject to the following conditions:

- Standard 3 year start condition
- Construction management plan - Dairy Farm track
- As recommended by highways
- As recommended by Environment Agency
- As recommended by Environmental Health
- Agreed timetable for the works to create the tunnel along Pound Lane
- Agreed timetable for the implementation of the realigned footpath
- Lighting scheme
- Details of and implementation of a Construction and Environment Management Plan
- Details and implementation of landscaping plan
- Monitoring of air quality
- Scheme of archaeological monitoring
- Details of materials
- Scheme for decommissioning
- Development to be constructed in line with the approved plans

If following the completion of the archaeological works and percolation tests within 6 months (or the extended date as may be agreed), it is the recommendation of the archaeology advisers and/ or the Environment Agency that the proposed development should not be granted planning permission due to its impact on in-situ archaeology and/or flood risk, that the application be referred to Planning Committee for determination.

Philip Isbell
Corporate Manager - Development Management

Elizabeth Truscott
Senior Planning Officer

APPENDIX A - PLANNING POLICIES

1. Mid Suffolk Core Strategy Development Plan Document and the Core Strategy Focused Review

Cor2 - CS2 Development in the Countryside & Countryside Villages

Cor3 - CS3 Reduce Contributions to Climate Change

Cor4 - CS4 Adapting to Climate Change

Cor5 - CS5 Mid Suffolks Environment

CSFR-FC1 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CSFR-FC1.1 - MID SUFFOLK APPROACH TO DELIVERING SUSTAINABLE DEVELOPMENT

2. Mid Suffolk Local Plan

GP1 - DESIGN AND LAYOUT OF DEVELOPMENT

CL11 - RETAINING HIGH QUALITY AGRICULTURAL LAND

CL13 - SITING AND DESIGN OF AGRICULTURAL BUILDINGS

CL14 - USE OF MATERIALS FOR AGRICULTURAL BUILDINGS AND STRUCTURES

T9 - PARKING STANDARDS

T10 - HIGHWAY CONSIDERATIONS IN DEVELOPMENT

T11 - FACILITIES FOR PEDESTRIANS AND CYCLISTS

RT12 - FOOTPATHS AND BRIDLEWAYS

T4 - PLANNING OBLIGATIONS AND HIGHWAYS INFRASTRUCTURE

3. Planning Policy Statements, Circulars & Other policy

NPPF - National Planning Policy Framework

APPENDIX B - NEIGHBOUR REPRESENTATIONS

Letters of representation have been received from a total of **14** interested parties.

The following people **objected** to the application

Matthew Jones, Walden, Nollers Lane, Spexhall

Mr Chris Mayhew, Ashford Cottage, 5 The Common, Little Blakenham

The Owner/Occupier, 6 The Common, Little Blakenham, Ipswich

Miss Jennifer Johnson, Honeysuckle Cottage, Bramford Road, Little Blakenham

Mrs Suzanne Bloomfield, 4 The Common, Little Blakenham, Ipswich

Mr Tim Hubert, 2 Lower Dairy Farm Cottages, Loraine Way, Bramford

Mrs Jean Dowling, 3 The Common, Little Blakenham, Ipswich

Mr & Mrs Yates, 3 Lower Dairy Farm Cottages, Loraine Way, Bramford

Mrs Kerrie Prentice, 22 Chapel Lane, Great Blakenham, Ipswich

Mr & Mrs SJ Woods, 1 The Common, Little Blakenham, Ipswich

Mrs H Mayhew, Tye View Cottage, Tye Lane, Bramford

Mr Clive Harris, The Coach House, Monks Gate, Sproughton

The following people **supported** the application:

Mrs Barbara Moss-Taylor, 16 Kirkton Close, Shotley Gate, Ipswich, Suffolk

Mrs Ruth Ward, 25 Levington Road, Ipswich,