

Committee Report

Item No: 7C

Reference: DC/22/06288

Case Officer: Vincent Pearce

Ward: Blakenham. (Note: Parishes of Little Blakenham, Great Blakenham (Port One) & Barham (Gipping Meadow Land) affected)

Ward Member/s: Cllr Adrienne Marriott.

RECOMMENDATION:

That,

▶ **(i)** Subject to the prior completion of appropriate binding Legal Agreement/s that secures the specific matters identified in section 4.26 of this report to the satisfaction of the Chief Planning Officer,

▶ **(ii)** The Chief Planning Officer is authorised to GRANT:

A: Full planning permission (*with appropriate conditions*) for the

“Erection of 3 no. warehouses and new vehicular access. Extension of estate roads, boundary landscaping, biodiversity enhancement and SuDS”*

(* on the Gipping Meadow Land - to be secured by S106 Agreement)

and;

B: Outline planning permission (*with appropriate conditions*) for:

“Further estate roads and six warehouse plots” (Only ACCESS and LANDSCAPE to be determined)

However,

▶ **(iii)** In the event that such Agreement/s is /are not signed within 6 months of the date of the Committee resolving to agree the recommendation to approve the applications in this report (or any amendment to approve) or such subsequent extended time period as The Chief Planning Officer considers reasonable to secure the Agreement/s, where there is in his opinion a realistic prospect of it being completed within such an extended period;

Then;

The application be referred back to Committee for further consideration and determination.

END

CLASSIFICATION: Official

Description of Development

Hybrid Planning Application comprising

1. **Full** Planning Application. Erection of 3no. warehouses and new vehicular access. Extension of estate roads, boundary landscaping, nature reserve and SUDS. (Port One Phase 2)
2. **Outline** Planning Application. (Access and Landscaping to be considered) for further estate roads and six warehouse plots (Port One Phase 3) beyond those included in the FULL application site.

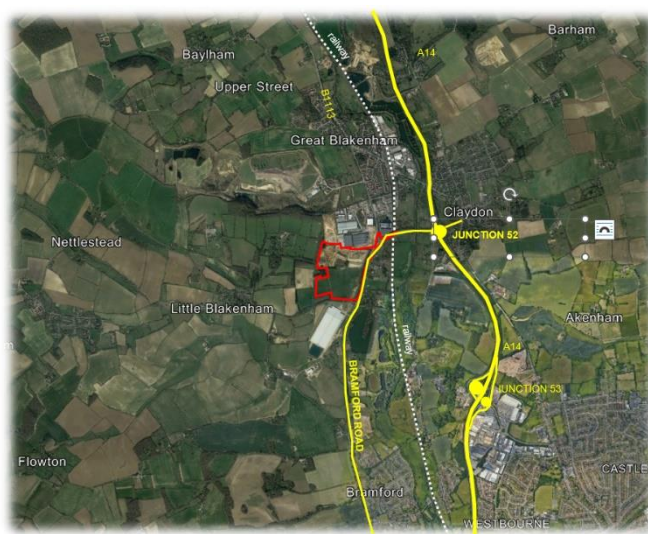
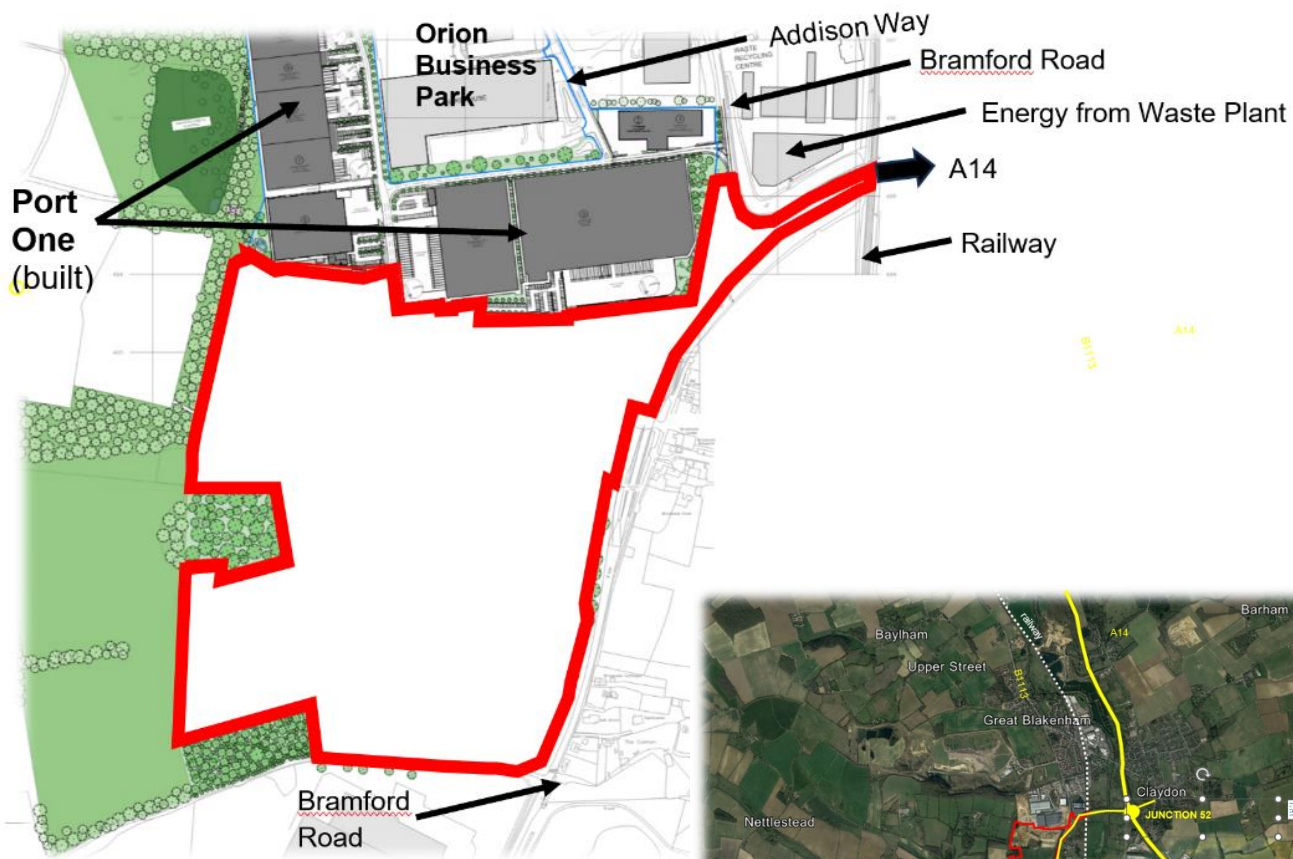
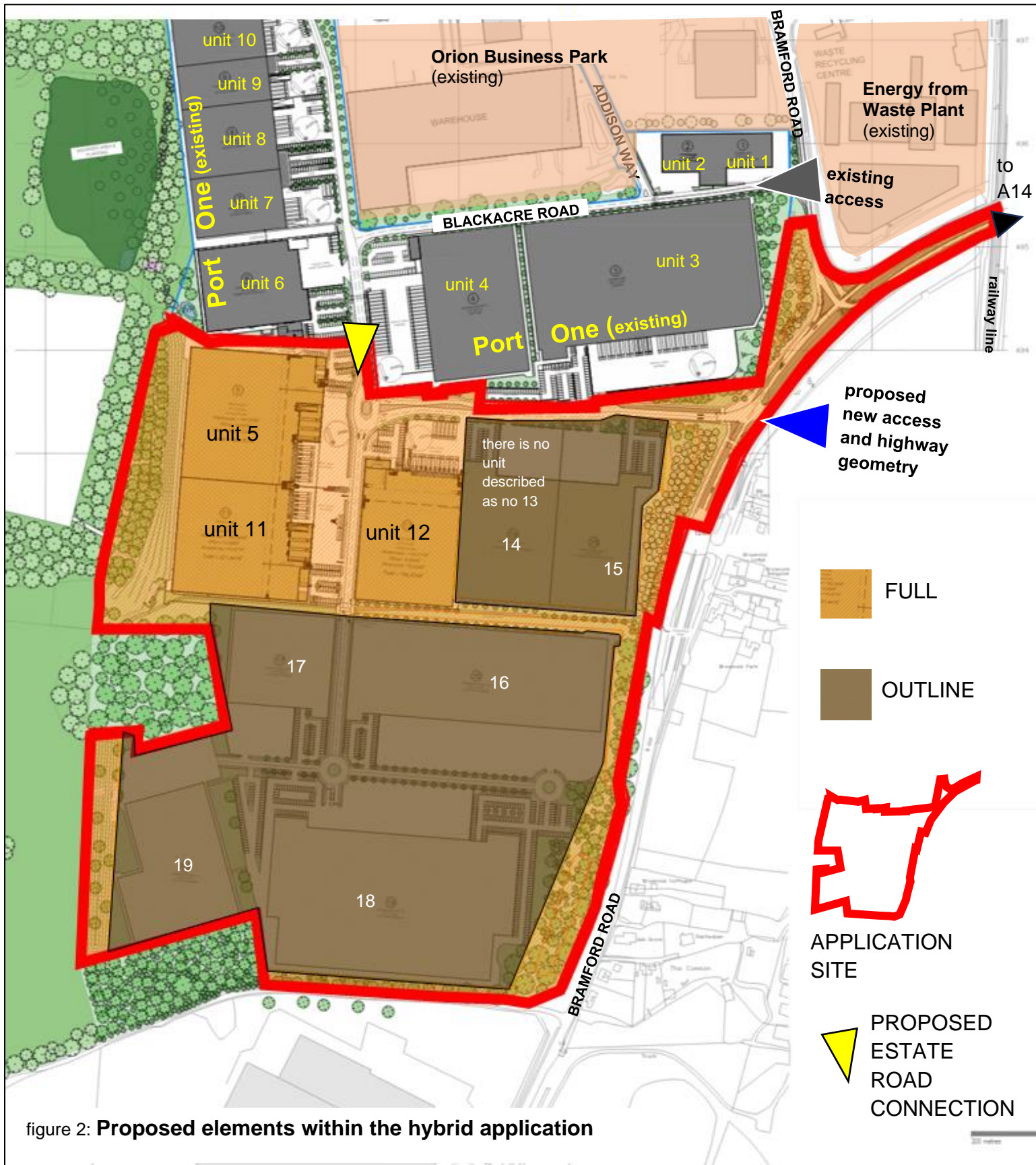


figure 1: Application site and local context



to mitigate its impacts.

Gipping Meadow (Mill Lane) nature area

- Land to be retained in freehold ownership of Curzon de Vere/Port One. (with MSDC purchase option)
- Public to have access to land at all times.
- Land to be managed by Curzon de Vere/Port One, at its own expense, in accordance with a management agreement to be agreed with Mid Suffolk.
- Mid Suffolk Council to have right to buy freehold for £1 (at any time).



figure 3: **Proposed Gipping Meadow nature area site for 'insetting' (biodiversity enhancement)**



figure 4: **Proposed Gipping Meadow nature area site for 'insetting' (aerial)**

Electric Shuttle Vehicles

- Provision of two 15-seater electric mini-buses, the first to be operational no later than simultaneously with the first of the FULL permitted units being brought into beneficial use, the second no later than simultaneously with the first of the units within with the OUTLINE area being brought into beneficial use. Earlier provision is permitted if the applicant chooses to do so.

Travel Plan

- Update, as necessary, Port One's Modeshift STARS¹ online Travel Plan.

Great Blakenham Park Council

- Village Hall - Install PV's on suitable roof slopes.
- Parish Room - Install PV's on suitable roof slopes or, as an alternative, a comparable ground array.

Claydon and Whitton Parish Council

- Village Hall - Install PV's on suitable roof slopes.

Barham Parish Council

- Community building - Install PV's on suitable roof slopes of one community building.

Bramford Parish Council

- Lorraine Victory Hall - Install PV's on flat roof.

Little Blakenham Council

- Port One to provide scheme drawings and to refurbish/rebuild Village Hall. The applicant, may consider supporting the project further but The Parish Council is expected to bid for CIL funding for such a project where eligible via the appropriate route.

Officer comment (in respect of all Parish Council mitigation measures above)

¹ Modeshift STARS is the Centre of Excellence for the delivery of Effective Travel Plans in Education, Business and Residential settings. The scheme recognises schools, businesses and other organisations that have shown excellence in supporting cycling, walking and other forms of sustainable and active travel.
<https://modeshiftstars.org/>

Communities around Port One have experienced some inconvenience from construction work associated with Phase 1 and this will continue if Phase 2 is approved. In response the applicant has worked with the five closest Parish Councils to develop a package of benefits designed to provide lasting mitigation as compensation for the short-term disruption associated with the build process.

In addition Curzon de Vere is seeking to raise the bar in terms of sustainability and the contribution their development can make to spreading the benefits of solar energy into the wider community. The company is locally based and whilst it is a commercial enterprise that seeks to be successful and profitable, the Directors have stated that they have a desire to 'put something back' into the community.

It is recommended that the community-based mitigation benefits (village hall improvements and access to electric shuttle vehicles) be the subject of a Unilateral Undertaking from the applicant (*which would also be binding on successors in title*) to reflect the nature of the offer.

GP Access Scheme/Community Access to Electric Shuttle Vehicles

- Port One to engage with Parish Councils and Needham Market Country Practice with the aim of setting up a GP Access Scheme using Port One electric shuttle vehicles during quiet times between shift changes at the Logistics Park. Port One also to explore other opportunities to facilitate access to the electric shuttle vehicles during off-peak times to improve accessibility and connectivity locally to key facilities and services beyond the local villages.

Officer comment:

This offer forms part of the applicant's approach to encouraging wider use of alternative modes of travel in line with policy LP29 and widening the benefits arising from the development to the wider community in line with LP28. Communities around Port One have experienced some inconvenience from construction work associated with Phase 1 and this will continue if Phase 2 is approved. In response the applicant has worked with the five closest Parish Councils to develop a package of benefits designed to provide lasting mitigation as compensation for the short-term disruption which has enabled the existing units as Port One to be constructed and occupied in a relatively short-time.

Employment Training Co-operation

- Port One to explore with MSDC Economy Team and other relevant agencies initiatives to provide training/.mentoring/support for local people to improve their prospects of entering the jobs market. This initiative does not require financial contribution but rather access to opportunities within Port One or access to skills and people to share those skills.

Officer comment:

This welcomed offer is the applicant's positive response to Policy SP05 (4), which states:

“ In determining applications for new employment development weight shall be given to proposals which make provision for skills and training packages which are supported by the relevant LPA”

CIL Compliance

The mitigation offered is considered to comply with the CIL Regs 2010 tests which require S106 obligations to be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development

Officer comment:

The proposed development will generate adverse environmental impacts that are being mitigated by the creation of a large nature area within the ownership of the applicant elsewhere in Great Blakenham. This will result in appropriate ecological and biodiversity compensation and enhancement.

The proposed highway improvements are critical to making the proposal acceptable in highway impact terms but it is intended to secure these improvements by way of a Grampian Condition at the request of Suffolk County Council Highways for the practical and financial reasons described in the Access section of this report. (Sections 4.1 and 4.26)

The Port One development is a largescale project, the construction process of which has already impacted local communities. If a further largescale expansion is permitted that impact will continue for more years.

The applicant, conscious of the unforeseen impacts that the construction process has had and will continue to have has worked with the five most affected parish councils to produce a package of village hall improvements that help to offset some of the disturbance and inconvenience.

Furthermore by offering to provide pv. panels on the roofs of village halls the applicant company is supporting its commitment to the delivery of the UK's most sustainable logistics park in a way that also benefits local communities and supports the Council's own policies to tackle climate change. It is recommended that these elements be secured by way of a Unilateral Undertaking from the applicant to reflect their intention to support the communities in question in this way.

The offer to work with the Council in developing employment skills and prospects for those seeking employment is directly related to the proposal and the applicants offer to participate in such an initiative is welcomed as Port One is becoming a major employer within the District. It supports the local economy and will contribute to wellbeing and resilience within the community and complies with Policy SP05 (4).

The offer to expand Port One's commitment to providing staff electric shuttle vehicles and the added offer to extend their use to local communities (for free) during off peak times is a great social innovation, particularly as local villages are not well served by public transport and communities have expressed their frustration at the lack of accessibility to key services (eg: GP

surgery in Needham Market) for those who do not have access to a car. It is recommended that these elements be secured by way of a Unilateral Undertaking from the applicant to reflect their intention to support the communities in question in this way

All of the above contribute to making the proposed development acceptable in planning terms, are directly related to it and are fairly and reasonably related in scale and kind to this massive project.

Location

Port One Business And Logistics Park, Bramford Road, Little Blakenham, Partly in The Parish of Little Blakenham and partly in the Parish of Great Blakenham

Expiry Date: Extension if time agreed 31 January 2024

Application Type: FUL - Full Planning Application

Development Type: Major Large Scale – Manufacturing /Industry/Storage/Warehousing

Applicant: Curzon De Vere

Agent: The JTS Partnership LLP

Parish: PORT ONE: Little Blakenham Great Blakenham (Gipping Meadow Land – Barham)

Site Area: 31.05ha* (excluding highway land) (*imperial equivalent 76.7acres)

Density of Development:

Gross Density (Total Site): Not relevant

Net Density (Developed Site, excluding open space and SuDs): Not relevant

Details of Previous Committee / Resolutions and any member site visit: None

Has a Committee Call In request been received from a Council Member (Appendix 1): No

Has the application been subject to Pre-Application Advice: Yes - informal associated with discussion of Phase 1 matters

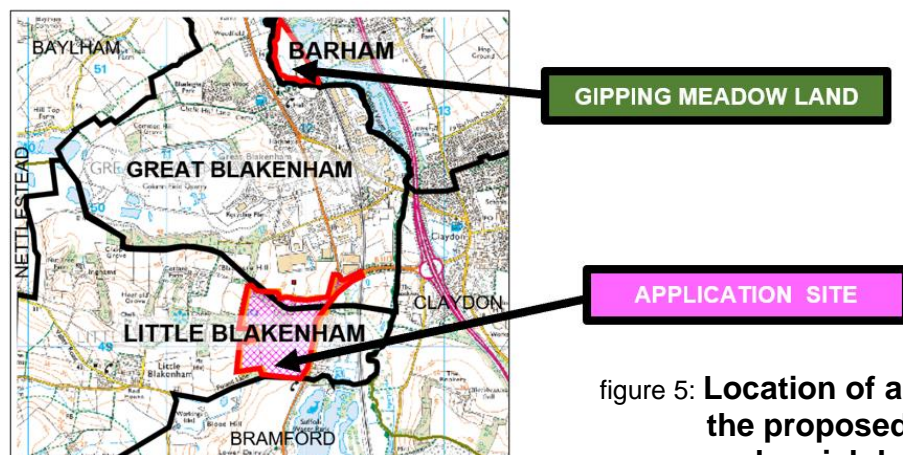


figure 5: **Location of application site relative to that of the proposed Gipping Meadow nature area and parish boundaries**

EXECUTIVE SUMMARY

The application before Members is what is known as a hybrid application. It seeks (i) FULL planning permission for the erection of 3 (three) warehouses and new vehicular access, extension of estate roads, landscaping, biodiversity enhancement and SuDs and (ii) OUTLINE planning permission for further estate roads and 6 (six) warehouse plots. (only ACCESS and LANDSCAPE to be determined)

The proposal has attracted support from Little Blakenham, Great Blakenham, Bramford, Claydon and Barham Parish Councils.

Suffolk County Council as local highway authority and Suffolk County Council as Lead Local Flood Authority raise no objection (both recommend conditions if permission is granted)

The proposal in its entirety is considered to comply with the most important policy for the determination of this application, that being Policy SP05 'Employment Land' of the Adopted Joint Local Plan 2023 (Part One).

It holds the prospect of generating up to 1250 new jobs which represents a major boost to the local economy and a valuable opportunity for many to gain employment which will have not just economic but social and wellbeing benefits.

If approved the applications are estimated (*by the applicant*) to then trigger some £415m of investment in the site. This is in addition to the £212.5m invested in the existing, completed Port One development (Phase 1). This represents a massive investment in the District and a strong expression of confidence in the local economy.

Phase 1 has already attracted significant international inward investment and that looks set to continue if permission is granted for the application before Members.

The application site is considered to be sustainably located in accordance with SP03 'The sustainable location of new development' of the AJLP2023 as it meets the requirement of SP03 2(c) comprising development within Table 5 - It is development along a strategic transport corridor

Whilst the proposed development will result in a low level of 'Less Than Substantial Harm' to heritage assets [*in this case the setting of four Grade II Listed buildings on the east side of Bramford Road including and associated with Broomvale House*], officers (DM) are strongly of the view that the public benefits that arise from the development outweigh the identified heritage harm even where considerable importance and great weight is afforded to the heritage harm identified, in accordance with statutory duties (i.e., s66 of the LBCA 1990). Therefore in terms of the test within paragraph 208 of the National Planning Policy Framework (December 2023) a decision to grant permission is justified and clear and convincing justification for it exists.

The proposal will result in some landscape harm and will result in the loss of some flora to accommodate the proposed development.

Officers believe that the mitigation included within the proposal is appropriate.

The inclusion of the site known as the 'Gipping Meadow Land' as a nature area has drawn widespread support from local communities and various services within the Council.

The increase in traffic that will arise from this development can be satisfactorily accommodated on the local and strategic network as a result of proposed highway improvements that will suitably boost capacity. Local Parish Councils have welcomed these improvements and support the proposal. Suffolk County Council Highways and National Highways do not object.

The proposals satisfy paragraphs 168-171 of the National Planning Policy Framework December 2023.

There are some local objections from residents but officers are of the opinion that the amended proposals will not give rise to unacceptable impacts on residential amenity sufficient to warrant refusal of the application.

The design quality of the proposal is good and it includes many elements designed to support tackling climate change that build upon green firsts delivered within phase 1.

The proposal also includes an extensive package of community benefits that have been worked up by the applicant in co-operation with five local parish councils. It is recommended that if Members are minded to approve the applications then these offers be the subject of a Unilateral Undertaking signed by the applicant rather than a Section 106 Agreement to reflect the nature of the offer which is being volunteered by the applicant rather than required by the Council to mitigate harm that would otherwise make the application unacceptable in planning terms.

The proposal is considered acceptable subject to securing the offered mitigation, infrastructure and community benefits by way of a Section 106 Agreement, Unilateral Undertaking and Grampian Condition as appropriate and suitable conditions.

END of SUMMARY

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PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reasons:

The scale of the application is such that it sits beyond the threshold described in the Council's Scheme of Delegation for the application to be determined by the Chief Planning Officer.

The application site includes land that is not presently allocated for development on the Proposals Map that accompanied the former Local Plan (that plan currently being Saved) but is considered to comply with Policy SP05 'Employment Land' in the newly Adopted Joint Local Plan. SP05 contemplates employment development on the A14 corridor, subject to compliance with identified requirements.

The Chief Planning Officer therefore considers it appropriate for the application to be determined by Committee in order that all material planning considerations can be explored openly in public as the Council has yet to prepare Part Two of the Joint Local Plan.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

Adopted Joint Local Plan 2023

- SP03 The Sustainable Location of New Development
- SP05 Employment Land
- SP09 Enhancement and Management of the Environment
- SP10 Climate Change
- LP09 Supporting a Prosperous Economy
- LP15 Environmental Protection and Conservation
- LP16 Biodiversity & Geodiversity
- LP17 Landscape
- LP19 The Historic Environment
- LP23 Sustainable Construction and Design
- LP24 Design and Residential Amenity
- LP25 Energy Sources, Storage and Distribution
- LP26 Water resources and infrastructure
- LP27 Flood risk and vulnerability
- LP28 Services and Facilities Within the Community
- LP29 Safe, Sustainable and Active Transport LP31
- LP30 Managing Infrastructure Provision
- LP32 Developer Contributions and Planning Obligations

Of the relevant policies in the *basket*, SP05 & LP09 are considered to be the most important policy for the determination of this application in the context of the ‘Wavendon’ High Court Judgement².

Policies SP03, SP05 & LP09 of the Adopted JLP 2023 are reproduced below for reference:

Note: Where policies/guidance are quoted below:

1. The **emboldened** text...
 - in **blue** is highlighted as particularly relevant to the consideration of principle.
 - in **black** is highlighted as relevant to consideration of details
2. The Unemboldened text...
 - in italicised *grey* is considered to be either less relevant or not engaged

■ SP03 – The sustainable location of new development

1. *New housing development will come forward through extant planning permissions, allocations in made Neighbourhood Plans, windfall development in accordance with the relevant policies of the Plan or Neighbourhood Plans and any allocations which are made in the forthcoming Part 2 Plan.*
2. *Settlement boundaries are defined on the Policies Map. These boundaries were established in earlier Local Plans and Core Strategies and have not been reviewed as part of the Plan but are carried forward without change at the present time. The principle of development is established within settlement boundaries in accordance with the relevant policies of this Plan. **Outside of the settlement boundaries, development will normally only be permitted where:***
 - a) **the site is allocated for development, or**
 - b) *it is in accordance with a made Neighbourhood Plan, or*
 - c) **it is in accordance with one of the policies of this Plan listed in Table 5; or**
 - d) *it is in accordance with paragraph 80 of the NPPF (2021).*

Table 5: Policies permitting development outside settlement boundaries, subject to the development’s accordance with other relevant policies of the Plan

² Wavendon Properties Limited v Secretary of State of Housing Communities and Local Government, Milton Keynes Council [2019] EWHC 1524 (Admin)

<u>Policy/para</u>	<u>Comments</u>
SP05 (1, 2 and 5)	development on strategic employment sites, at Brantham and along strategic transport corridors

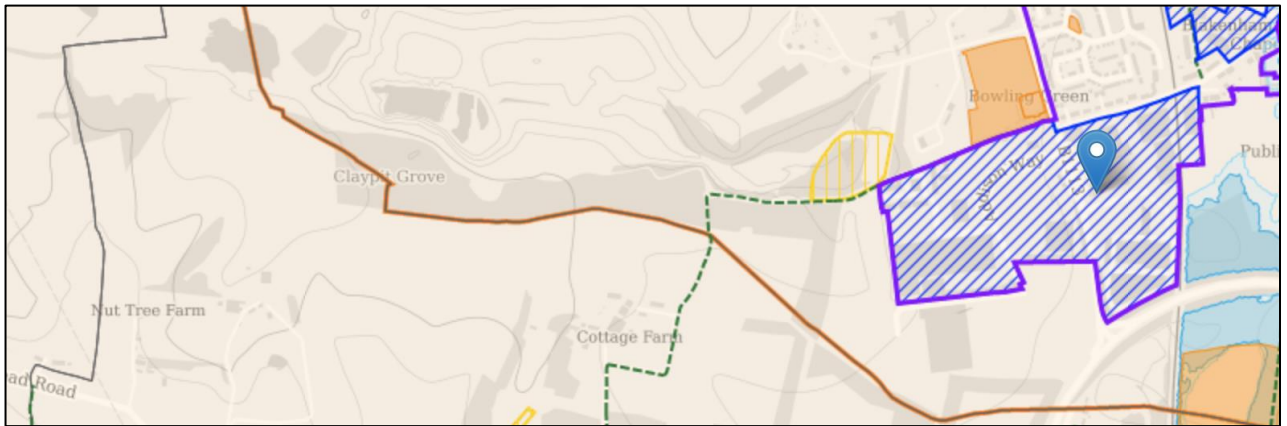
figure 6: **Extract from Table 5 JLP (page 30)**

■ **SP05 – Employment Land**

- 1) *In order to support and encourage sustainable economic growth (i) the designated strategic employment sites (as identified in Table 6 and on the Policies Map) shall be protected and employment uses within them will be supported in principle; and (ii) other land used for employment purposes shall be protected for ongoing employment use, unless such use is convincingly demonstrated to be unviable.*
- 2) *The ongoing regeneration at Brantham and at the Former Sproughton Sugar Beet Factory regeneration sites is supported. Development at the Brantham site must be sensitive to the estuarine/coastal location, which is in close proximity to the AONB, in relation to landscape, biodiversity, potentially flood risk, and, where relevant, the historic environment. This site could offer significant potential for biodiversity net gain as well as landscape enhancements to reflect its location close to the AONB and coast. Similarly, regeneration at the Former Sproughton Sugar Beet Factory, must be sensitive to landscape, biodiversity (with consideration given to potential for biodiversity net gain) and heritage assets.*
- 3) **Where appropriate, conditions will be applied to Use Class E developments to control the uses which can be operated.**
- 4) **In determining applications for new employment development weight shall be given to proposals which make provision for skills and training packages which are supported by the relevant LPA.**
- 5) **To ensure a deliverable supply of employment sites to accommodate the changing needs of the economy, development of other land for employment uses along the strategic transport corridors (as defined in the glossary) shall be supported in principle, subject to:**
 - a. **The applicant demonstrating that any proposal is deliverable and would enhance provision which cannot be accommodated on existing strategic employment sites;**
 - b. **All proposals demonstrating adequate highway capacity and access with sufficient on-site parking;**
 - c. **Ensuring provision of accessibility to public transport, including walking and cycling provision;**
 - d. **The site design and layout being sensitive to the surroundings, including any landscape, heritage and biodiversity assets;**
 - e. **Prioritisation being given to development on previously development land; and**

f. All new buildings demonstrating a high standard of design, by having regard to the relevant policies of the Plan.

6) Any application for non-domestic proposals requiring heavy water usage across the two Districts will be required to demonstrate that sufficient water capacity is available through a Water Supply Management Statement in liaison with the relevant water supply company. Any use of this nature in the Hartismere Water Resource Zone (Mid Suffolk District) will be prohibited until confirmation of sufficient water capacity by the relevant water supply company (currently anticipated from 2032).”



Gipping and Claydon Business Park, Great Blakenham and Claydon

44.18 ha

Great Blakenham

Table 6: Strategic Employment Sites and Gross* Areas

Site No.	Site Name	Total Site Area (Ha)	Vacant Land (Ha) (as at Nov 2022)
Mid Suffolk			
9	Eye Airfield	140.8	11.0
10	Great Blakenham – Gipping and Claydon Business Park	44.2	0
11	Needham Market – Lion Barn	17.4	3.4
12	Stowmarket – Charles industrial Estate	2.2	0
13	Stowmarket – Gipping Employment Corridor	111.9	4.1
14	Stowmarket – Mill Lane / Gateway 14	79.3	79.3
15	Woolpit – Brickworks	4.4	0
16	Woolpit Business Park	10.7	2.3
17	Woolpit – Lady’s Well	11.8	1.5
18	Woolpit – Lawn Farm	17.1	8.2
Mid Suffolk Sub-Total		439.8	109.8
Total		628.5	129.9

* Gross includes developable areas for employment uses as well as areas of constraint such as access roads, landscaping, and areas of flood risk.

figure 7: **Employment land references**
LP09: Supporting a Prosperous Economy

“

1. **Proposals for employment use must:**
 - a. **Be sensitive to the surroundings, including any residential and other amenity, landscape and heritage assets;**
 - b. **Demonstrate a high standard of design;**
 - c. **Where necessary, provide contributions to the enhancement of the digital infrastructure network; and**
 - d. **Demonstrate a safe and suitable access for all users, sufficient on-site parking and that it will not have a severe impact on the road network.**
2. *Change of use to small scale employment within a residential curtilage is supported where:*
 - a. *There are no direct sales from the site;*
 - b. *The direct and indirect effects of the scale of the business activity, including the employment of non-residents at the business, must remain incidental to the overall use of the site for residential purposes;*
 - c. *The hours of operation are compatible with residential use; and*
 - d. *The business does not create noise, dust, fumes or other emissions, outdoor storage or frequent delivery/collection that are likely to give rise to significant adverse impacts on health, quality of life or local amenity”.*

Neighbourhood Plan Status

This application site is not within an area subject to a made/adopted Neighbourhood Plan and nor is it within an area where one is being prepared

Ipswich Functional Economic Area

Mid Suffolk is within the Ipswich Functional Economic Area³ within which the A14 corridor is identified as a key location for employment and economic growth.

³ <https://www.ipswich.gov.uk/content/ipswich-strategic-planning-area>

the Ipswich Functional Economic Area, extends over the whole of Ipswich Borough, and Babergh, Mid Suffolk and the former Suffolk Coastal District element of East Suffolk.

There is an ISPA (Ipswich Strategic Planning Area) Board consisting of councillors from Babergh, Mid Suffolk and East Suffolk, Ipswich Borough Council and Suffolk County Council which is a key vehicle for cross boundary planning in the ISPA. The Board is supported by an officer group made up of key officers from the constituent authorities. Policies in the Adopted JLP have all been subject to the Duty to Co-operate. **The A14 is a strategic employment corridor.**

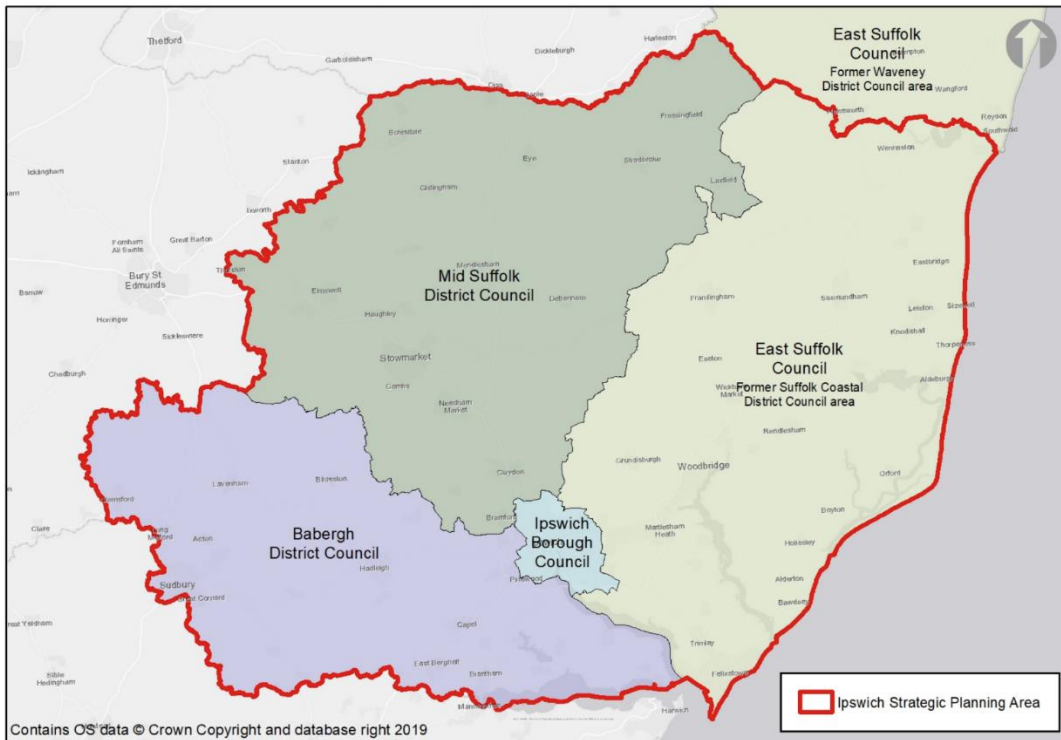


figure 8: **Ipswich Functional Economic Area** (Ipswich Strategic Planning Area)

National Planning Policy Framework (NPPF) Revised Version (December 2023)

Particularly relevant are:

■ Paragraph 11: The Presumption of favour of sustainable development

“Plans and decisions should apply a presumption in favour of sustainable development.....

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for

determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

■ Paragraph 87:

*“Planning policies and **decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.**”*

CONSULTATIONS AND REPRESENTATIONS

During the course of the application Consultation and Representations have been received. These are summarised below.

[Click here to view consultee comments online](#)

SUMMARY OF CONSULTATIONS

Parish Councils

*(please note: **emboldened text within this section is an emphasis added by the case officer**)*

The majority of the logistics park expansion site sits within the Parish of Little Blakenham but the northern edge nudges into Great Blakenham. Previous phases of Port One sit within Great Blakenham.

The proposed Gipping Meadow nature area is a thumb of land within the Parish of Barham that pushes into Great Blakenham. Consequently both Barham and Great Blakenham Parish Councils are potentially affected.

The location of Port One is such that it coincides with the juxtaposition of five parish boundaries. Consequently the Development Management Service has been actively liaising with :

- Barham Parish Council
- Bramford Parish Council
- Claydon Parish Council
- Little Blakenham Parish Council
- Great Blakenham Parish Council

A number of these meetings were held collectively with Port One representatives present.

Throughout this process the liaison has also featured a strong presence from the Council's Communities Service.

This unprecedented level of involvement has resulted in the views of all those parishes that are either directly or indirectly affected by this significant application being fully explored and the

application shaped as a result. That dialogue has been expanded to embrace other issues is now ongoing.

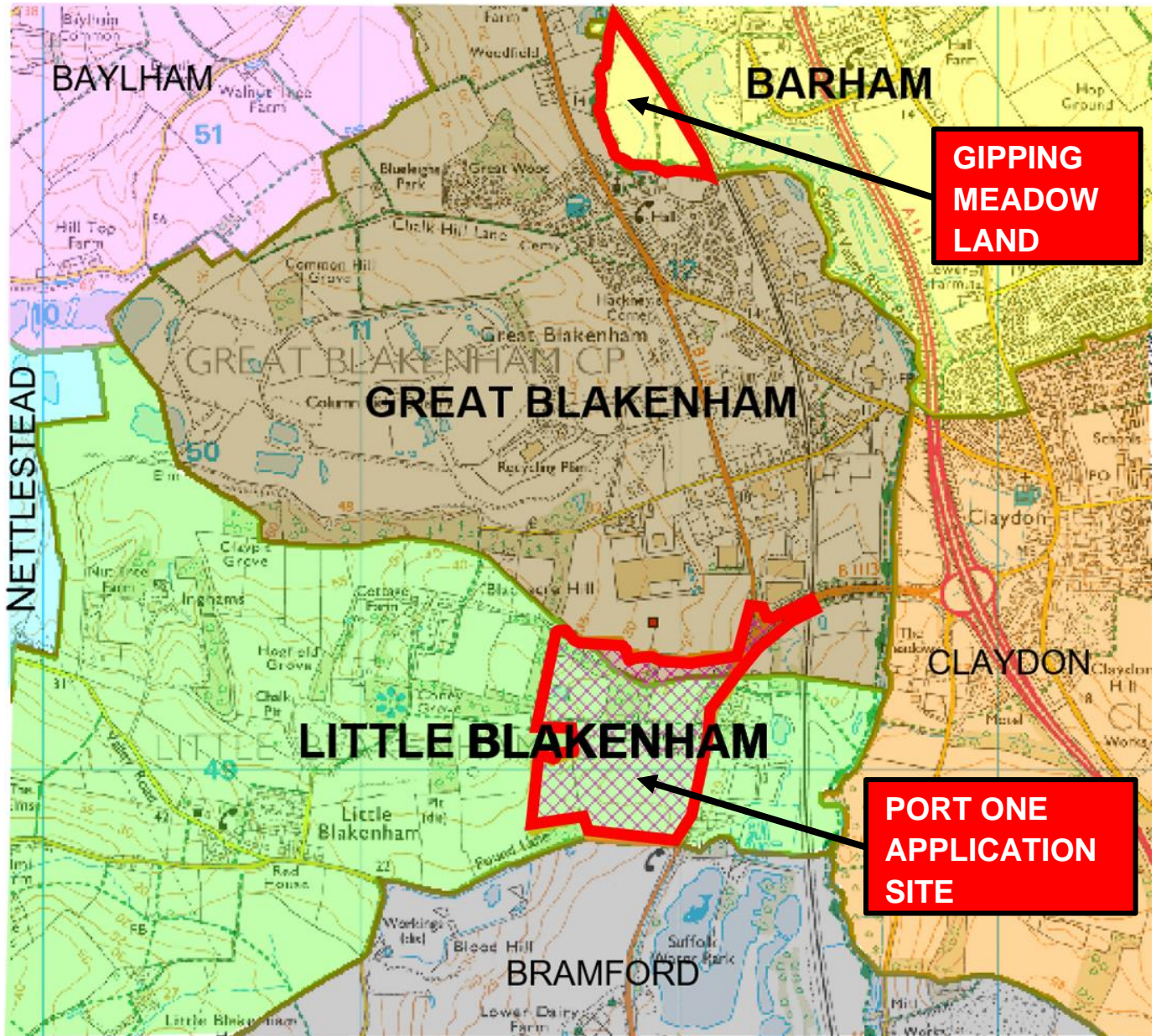


figure 9: **Parish Boundaries** (The Parish Councils for Barham, Bramford, Claydon & Whitton, Great Blakenham and Little Blakenham are referred to in this report as the Five (5) parishes for the purpose of regular parish liaison meetings)

LITTLE BLAKENHAM PARISH COUNCIL: 27 August 2023

*“The Parish Council now has **no objections** to the application but requests that special attention should be given to maintaining the road hedge line and the access into the site from Bramford Road”*

Officer comment:

The Parish Council's desire to ensure that the frontage tree and hedge line to Bramford Road is safeguarded is understood and the objective shared. The existing mature tree and hedge line makes a strong contribution to the visual quality of the street scene thereabouts. Whilst providing an important green corridor it will also help to soften the impact of the proposed development in near views. Retention will be secured by condition and future Reserved Matters submissions will need to demonstrate sensitivity to the existing frontage flora if they are to be approved. *(in the event that Members are minded to approve the current application)*

■ **GREAT BLAKENHAM PARISH COUNCIL: 13 October 2023**

“ As a Parish Council we responded to the planning application with concerns on several areas, these concerns were also common with Phase One and Two.

*Having had good engagement with the developer since the beginning of the project we the Parish Council have agreed that **the concerns have been addressed** and demonstrated in the earlier phases.*

Phase Three brings one very important and beneficial addition, the revised infrastructure for traffic into the development, thus relieving the already busy junction off the B1113 into the development.

It is also a benefit to the Parish that the developer is supporting our initiatives such as solar panels on our community buildings and a large piece of riverside land set aside as a wildlife / green area.

The final benefit is of course employment for residents in the surrounding area. Having now seen the minimal impact of Phases One & Two, the impact on our Parish is acceptable and we hope it continues in the same manner.”

Officer comment:

The support of Great Blakenham Parish Council and its description of what are described as perceived benefits of the proposal are noted.

■ **BARHAM PARISH COUNCIL: 19 December 2023**

*“ I have reviewed the Barham parish council minutes and the port one development was discussed on 27th June 2023 . The council decided that as the development does not directly affect Barham we have **no objections** to the development , on a side note the offer of solar panels onto certain public buildings was well received”*

■ BRAMFORD PARISH COUNCIL: 18 January 2023

*“ Bramford Parish Council have considered this application at Parish Meeting of 16th January 2023, and wish to file **no objection**. They however wish to raise suggestion that there be considered landscaping planned for surrounding area, with possible installation of solar panels.”*

Officer comment:

The applicant is proposing to provide solar panels on a number of village halls in the area in response to representations from the ‘five’ parish councils. These will be best secured by way of a Unilateral Undertaking. The suggestion in respect of landscaping is acknowledged and the proposal includes significant new planting as well as the Gipping Meadow nature area.

Landscaping and ecological impacts are considered in greater detail in the Assessment section of this report at sections 4.18 and 4.19).

■ CLAYDON & WHITTON PARISH COUNCIL: 21 November 2023

*“ The Claydon and Whitton Parish Council **are neutral** about the building extensions, however our concern is the roads. The Claydon roundabout, being only single lane, is unfit for the quantity of lorries that will be coming from Bolton's, the recycling centre, the lorry park on paper mill lane as well as, the port one. This does not count in the increased quantity of cars due to the excessive building in Claydon, Barham and Bramford who in all likelihood will use the roundabout to access the A14 and the schools that Claydon provide. **We have no issue with port one just the lack of infrastructure.**”*

CLAYDON & WHITTON PARISH COUNCIL: 19 December 2023

*“I've been asked to email you on behalf of Claydon and Whitton Parish Council to say that **we support your requests to have the roundabout altered to two lanes.**”*

The roundabout was originally two lines from Bramford direction. Following the incinerator being built, highways closed one of the lines forcing everyone into one lane for Claydon and A14 east. Two lanes would allow traffic going to Claydon to have their own lane going under the bridge. “ email from Clerk to Port One following receipt of amended roundabout plans.

Officer comment:

In response to local concerns (as above) and input from Suffolk County Highways the applicant has amended the application to include important improvements to the roundabout at junction 52 (A14). These will create a new section of two lane running between the Great Blakenham arm and the Claydon arm. Currently the carriageway here is single lane. Some modest widening of the Claydon arm for traffic approaching the roundabout to join the A14

on slip is also included. (please note: fuller are details provided in the Assessment section of this report at sections 4.10 and 4.11)

These steps will increase capacity on the roundabout and are welcomed. The local highway authority is satisfied with the improvements to the roundabout now included in the proposal.

These works will go a long way to addressing the concerns expressed by Claydon and Whitton Parish Councils in terms of facilitating improved capacity and therefore traffic flow to meet the increased pressure from development at Port One.

It should be noted that the improvements were not required by National Highways. However as the roundabout itself is managed by Suffolk County Council the view of the local highway authority has been given significant weight when negotiating the improvements now included.

Members will note that on 19 December 2023 the Claydon & Whitton Parish Council indicated that it supported the amended roundabout improvements and as a result it is assumed that their previously expressed neutrality may now be closer to overall support not just of the principle (as was the case previously) but also now for the highway infrastructure improvements. (which was the Parish Council's previously expressed concern).

The functionality of Junction 52 is obviously of great importance to the people of Claydon because its eastern arm provides a direct link to/from the village from/to the A14. The increase in capacity that arises from the proposed improvements should ensure that the people of Claydon are not inconvenienced by the increase in traffic that will arise from the latest Port One proposal.

■ NETTLESTEAD PARISH COUNCIL: 30 January 2023

*“ Nettlestead Parish Meeting **objects** to the application. The Meeting regrets the continued encroachment on agricultural land for commercial purposes, particularly given the inappropriately large storage units already abutting the B1113 on the adjacent site. In particular the Meeting is concerned at the inevitable growth of traffic in the area, specifically on the B1113 and its junction with the A14 at Claydon. Developments nearby have grown piecemeal without apparent consideration of the impact on congestion and road safety. Should the Council be minded to approve the application we urge it to condition that the vast roof space created be fully utilised for electricity generation through EV solar panels. This would help emphasise that industrial development must contribute to the community 'green' infrastructure.”*

Officer comment

Whilst Nettlestead can perhaps be thought of as geographically peripheral to the application site when compared to Little and Great Blakenham, Barham, Bromford and Claydon (whose parish council's do not object) its residents also have need to use the A14. Concerns about the ability of Junction 52 to function effectively if the application is approved (increased traffic) can hopefully be allayed as a result of the proposed roundabout improvements.

Their comments in respect of additional traffic on the B1115 are noted and as will be explained later in this report proposed traffic management measures to be included in the development (as with Phase 1) are designed to divert hives from using the B1115 through neighbouring villages to gain access to and from the A14.

■ NATIONAL CONSULTEES

NATIONAL HIGHWAYS: 5 October 2023

*“Notice is hereby given that Highways England’s [sic] formal recommendation is that we:
a) **offer no objection;**”*

NATURAL ENGLAND: 29 August 2023

“Has **no comment to make**”

HISTORIC ENGLAND: 14 August 2023

“Thank you for your letter of 7 August 2023 regarding further information on the above application for planning permission. On the basis of this information, **we do not wish to offer any comments.** We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.”

Officer comment

Members will note that there are no Grade I or II* Listed Buildings in the vicinity (nor any Conservation area/s) and so H.E. would not normally have been consulted by MSDC but they were on this occasion as a courtesy due to the size of the proposal.

MINISTRY of DEFENCE (M.O.D.): 2 February 2023 (reason for consultation - proximity of proposed tall buildings to Wattisham Airfield and large roof areas – possible bird strike risk)

*“I can confirm that the MOD has **no objections** in respect of the maximum height of the buildings. On the basis of the information provided for the outline planning application I can confirm that the MOD has no concerns in respect of the building heights at this time.”*

ENVIRONMENT AGENCY: 23 January 2023

*“We have **no comments at this time** for this application. This application falls outside of our external consultation checklist.”*

■ COUNTY COUNCIL RESPONSES

SCC Highways: 21 December 2023

*“Further to the submission of additional information and confirmation that National Highways are also satisfied with the proposal, **we are now in a position to recommend the planning conditions shown below.***

It should also be noted that acceptance of this proposal does not infer or approve any further changes to the recently completed approved access onto Bromford Road, that is due to be upgraded with traffic signals once an agreed level of floor space is occupied.

It is understood that construction of Unit 5 is already underway (from a previous permission).

Therefore, condition triggers have been adjusted to accommodate this.

SCC Travel Plan team require the Travel Plan to be extended to cover the full expanded development resulting from this proposal and this is reflected in the planning conditions and S106 contribution request below.

Conditions relating to the full and outline proposals:

Condition: *No part of the development shall be commenced (except for Unit 5) until full details of the proposed signalised access junction and associated highway improvements indicatively shown on drawing nos. 2140/07 Rev D and 2140/08 Rev D have been submitted to and approved in writing by the Local Planning Authority. The approved access and associated highway improvements shall be laid out and constructed in their entirety prior to any occupation of the buildings except for Unit 5.*

Reason: To ensure that the access and associated highway improvements are designed and constructed to an appropriate and acceptably safe specification and made available for use at an appropriate time.

Condition: *No part of the development shall be commenced (except for Unit 5) until full details of the proposed highway improvements to A14 Junction 52 roundabout indicatively shown on drawing no. 2140/09 Rev B have been submitted to and approved in writing by the Local Planning Authority. The approved highway improvements shall be laid out and constructed in their entirety prior to any occupation of the buildings except for Unit 5.*

Reason: To ensure that the highway improvements are designed and constructed to an appropriate and acceptably safe specification and made available for use at an appropriate time.

Condition: No part of the development shall be commenced (except for Unit 5) until full details of a scheme to manage use of the highway accesses (such as signage, barriers and one-way routing) has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety prior to any occupation of the buildings except for Unit 5.

Reason: To ensure that the highway improvements are designed and constructed to an appropriate and acceptably safe specification and made available for use at an appropriate time.

Condition: Before the development is commenced (except for Unit 5), details of the industrial estate roads and footpaths, (including layout, levels, gradients, surfacing, lighting, traffic calming and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety to ensure that roads/footways are constructed to an acceptable standard.

Condition: Before the development is commenced (except for Unit 5), details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway including any system to dispose of the water. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

Condition: Before the development is commenced (except for Unit 5), details of the areas to be provided for the storage and presentation for collection/emptying of refuse and recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved bin storage and presentation/collection area shall be provided for each unit prior to its first occupation and shall be retained thereafter for no other purpose.

Reason: To ensure that space is provided for refuse and recycling bins to be stored and presented for emptying and left by operatives after emptying clear of the highway and access to avoid causing obstruction and dangers for the public using the highway.

Condition: Before the development is commenced (except for Unit 5), details of the areas to be provided for the secure, covered and lit cycle storage including electric assisted cycles shall

be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented for each unit prior to its first occupation and retained as such thereafter.

Reason: To promote sustainable travel by ensuring the provision at an appropriate time and long term maintenance of adequate on-site areas and infrastructure for the storage of cycles and charging of electrically assisted cycles in accordance with Suffolk Guidance for Parking (2023).

Condition: *Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan.*

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors*
- b) loading and unloading of plant and materials*
- c) piling techniques (if applicable)*
- d) storage of plant and materials*
- e) provision and use of wheel washing facilities*
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works*
- g) site working and delivery times*
- h) a communications plan to inform local residents of the program of works*
- i) provision of boundary hoarding and lighting*
- j) details of proposed means of dust suppression*
- k) details of measures to prevent mud from vehicles leaving the site during construction*
- l) haul routes for construction traffic on the highway network and*
- m) monitoring and review mechanisms.*
- n) Details of deliveries times to the site during construction phase.*

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

Travel Plan Condition:

Prior to first occupation of the permitted development, details of the travel arrangements to and from the site for employees, in the form of a revised Travel Plan shall be submitted for the approval in writing by the local planning authority in consultation with the highway authority.

This revised Travel Plan must include the following:

A commitment that the shuttle bus is continued for at least the life of the Travel Plan.

The site shall not be occupied until the Travel Plan has been agreed. The revised Travel Plan measures shall be implemented for at least 5 years from full occupation of the permitted development.

Reason: In the interest of sustainable development as set out in the NPPF, and relevant LPA Policies.

Conditions relating to the full proposals only:

Condition: *The use shall not commence until the area(s) within the site shown on drawing no. POLP-MP-2003-P4 for the purposes of loading, unloading, manoeuvring and parking of vehicles has / have been provided and thereafter the area(s) shall be retained, maintained and used for no other purposes.*

Reason: To ensure that sufficient areas for vehicles to be parked are provided in accordance with Suffolk Guidance for Parking (2023) where on-street parking and or loading, unloading and manoeuvring would be detrimental to the safe use of the highway.

Conditions relating to the outline proposals only:

Condition: *Before the development is commenced details of the areas and infrastructure to be provided for the loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles and electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented for each unit prior to its first occupation and retained as such thereafter.*

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with the current Suffolk Guidance for Parking where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety.

Notes:

Note: *It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.*

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing. For further information please visit:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

Note: *The public right of way cannot be lawfully driven along without due authority. This highway must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore it is imperative that the surface is properly maintained for lawful use during the construction phase and beyond.*

The Highway Authority will seek to recover the cost of any such damage which it actions for repair.

Section 106 Contributions/ Obligations:

SCC Travel Plan team have requested that the Travel Plan monitoring fee (estimated £1,000 per annum) is extended to cover the revised and extended Travel Plan period.

SCC Flood and Water (as LLFA): email dated 22 November 2023

“Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/22/06288

*The following submitted documents have/has been reviewed and the LLFA recommends **approval** subject to conditions.*

- Units 5 to 17 Existing Plan Ref 2242 DE H 10-02 Rev B*
- Units 5 to 19 Proposed Site Plan Ref 2242 DE H 10-01 Rev H*
- Units 5 to 19 Site Location Plan Ref 2242 DE H 10-03 Rev B*
- Site Specific Flood Risk Assessment ref 61860 dated November 2023 Rev E*
- Landscape Proposals sheets 1 to 4 Ref 1835-051 Rev A, 1835-0052 Rev A, 1835-0053 Rev A & 1835-0054 Rev A*

Full Planning Conditions (Units 5,11, & 12)

The LLFA will look to propose suitably worded planning conditions for the full element of the application to the LPA.

Outline Planning Conditions (Units 14 to 19)

- 1. Concurrent with the first reserved matters application(s) of each phase of the development, a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority (LPA). The scheme shall be in accordance with the approved FRA and include:*
 - a. Dimensioned plans and drawings of the surface water drainage scheme;*
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;*
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;*
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;*
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year rainfall event including climate change, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;*
 - f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;*
 - g. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.*

- h. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include: Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-*
- i. Temporary drainage systems.*
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses.*
 - iii. Measures for managing any on or offsite flood risk associated with construction.*

The scheme shall be fully implemented as approved.

Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

- 2. Within 28 days of practical completion of the unit, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.*

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk within the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991.*

- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment may be subject to payment of a surface water developer contribution.
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act.
- Any works to a main river may require an environmental permit.”

SCC PUBLIC RIGHTS of WAY (PRoW) TEAM: 16 August 2023

“ We **do not object** to this proposal provided the following is taken into account:”

Standard informatives to be added to any planning permission

SCC ARCHAEOLOGY: 5 January 2023 (repeated 8 August 2023)

“This site lies in an area of known archaeology recorded on the County Historic Environment Record. A first phase of archaeological evaluation within the proposed development area has identified the remains of a prehistoric round barrow, Iron age pits, an Iron Age enclosure and a Roman field system (BRF 106). Archaeological investigations immediately to the north have also identified prehistoric, Roman and medieval finds and features (BLG 017, 024, 036) Geophysical survey across the remaining parts of the proposed development area has identified a number of anomalies of potential archaeological origin. As a result, there is high potential for the discovery of further below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development will damage or destroy surviving archaeological remains which have previously been defined.

The ecological mitigation area is also situated within an area of high archaeological potential, within medieval finds recorded within and immediately adjacent to the proposal site (BRH 061, BLG 048) and Palaeolithic, Mesolithic, Neolithic and Saxon finds identified to the east (BRH 003). This site is also situated close to a medieval church (BLG 005) and to a number of sites where Roman and medieval finds and features have been recorded during recent archaeological investigations (BLG 013, 044, 035, 037). As such there is high potential for archaeological remains to survive within this area, and depending upon the scope of works, for damage to occur to any below ground heritage assets which are present.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case SCCAS advises that the following **two conditions** would be appropriate (and if the LPA deems necessary, also separate conditions for the ecological mitigation area):

1. No development shall take place within the area indicated [the whole site] until the

implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
 - b. The programme for post investigation assessment
 - c. Provision to be made for analysis of the site investigation and recording
 - d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
 - e. Provision to be made for archive deposition of the analysis and records of the site investigation
 - f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
 - g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.
2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2021).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site.

Within the main development area, completion of the geophysical survey for any areas of the development which have not yet been surveyed, as well as a second phase of archaeological trial trenched evaluation across all areas of the scheme, will be required to establish the potential of the site and decisions on the need for mitigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the

basis of the results of the evaluation. A number of mitigation areas have already been defined on the basis of the results of previous phases of evaluation, however, additional areas requiring mitigation, prior to the commencement of any works involving ground disturbance on site, may be defined during this subsequent work.

Within the ecological compensation area, archaeological assessment (to be determined by the final scope of planned works), followed by mitigation as appropriate will be necessary prior to the commencement of any works in this area.

Further details on our advisory services and charges can be found on our website:
<http://www.suffolk.gov.uk/archaeology/>

SUFFOLK FIRE and RESCUE SERVICE: 29 December 2022 [sic]

Fire hydrant **condition** required.

Sprinkler advice

INTERNAL CONSULTEE RESPONSES

STRATEGIC PLANNING: 21 December 2023

*“The Strategic Planning team **support the proposal in principle subject to** meeting the criteria set out in Policy SP05 (5) of the adopted Babergh and Mid Suffolk Joint Local Plan Part 1 Development Plan Document (November 2023) given the planning history of the site, and also subject to the associated infrastructure required being delivered.”*

- Robert Hobbs, Corporate Manager - Strategic Planning

HERITAGE TEAM: 6 January 2023 (repeated 7 August 2023)

“The proposal is in two parts; for Full Planning Permission for the erection of 3no warehouses and new vehicular access with extension of estate roads, boundary landscaping, nature reserve and SUDS, and for Outline Planning Permission with access and landscaping to be considered for further estate roads and 6no warehouse plots.

To the east of the proposed site is a group of four Grade II Listed Buildings, including and associated with Broomvale House. Broomvale House itself is a former farmhouse with C16 core and major alterations of early C19 and early C20. The C19 range has the main entrance front facing south and is of painted brick. The roof is plain tiled with an external end chimney. The two storey C16 range became the rear service wing in C19, comprising of the original hall and service cell which are timber framed and plastered,

with some C18 herringbone pargetting in panels. A large two storey extension was added to the rear c.1930.

The three other Grade II listed buildings are 'Barn, aligned east-west, 30 metres north-west of Broomvale House' a C18 five bay timber-framed and weatherboarded barn with double Roman pantiled roof and reused oak timbers from an earlier building with attached C19 outbuildings, 'Stable, aligned north-south, 40 metres north-west of Broomvale House' a C18 timber-framed and weatherboarded stable with hayloft above and Pantiled roof with ridge tiles crested alternately with trefoils and fleurs-de-lys which also contains reused heavy oak timbers, and lastly 'Barn 40 metres north of Broomvale House' a late C18 five bay timber-framed and weather-boarded barn on red brick plinth with hipped pantiled roof and reuse of oak timbers.

The heritage concern relates to the potential impact of the works the settings of the group of designated heritage assets associated with Broomvale House, insofar as they contribute to their significance.

The heritage team has not commented on previous applications further north, most notably Outline application DC/20/01175 and its amendments. These applications proposed landscaping to the southern boundary of the site, and did not encroach upon the agricultural setting of Broomvale House and other associated designated heritage assets.

Broomvale House and the individually listed stable and barns formed a historic farmstead group, which would have been understood in the context of the surroundings agricultural land, some of which it would have had a working relationship with. It is considered that the proposed extension of the industrial estate southward would encroach upon the settings of the designated heritage assets, altering its character and appearance. The current undeveloped agricultural land which forms the proposed site makes a positive contribution to the understanding of the group as former agricultural buildings.

In conclusion, I consider that the application would cause a **low level of less than substantial harm to the settings of the identified group of designated heritage assets**.

The application also does not include a heritage impact assessment as required by paragraph 194 of the NPPF. The application therefore fails to meet the requirements of the NPPF or of Local Plan Policy HB01. “

Officer comment:

Whilst the Heritage Team comment that a Heritage Impact Assessment was not submitted this is not the case. Such a statement was submitted on 20 January 2023 and it concluded:

“Given the local topography, intervening boundary landscaping (the majority of which is existing) and the character and setting of the farmstead group (which is dominated by a dual carriageway, 1960’s housing and the Suez waste to energy plant), the further extension of the Port One Logistics Park will have no adverse impact upon the setting of Broomvale House, or the associated its group of agricultural buildings, and will cause no harm to heritage significance”.

In determining this application Members are advised that it is the advice of the Heritage Team that should be given greater credence.

Officers (DM) have considered the merits of this proposal on the basis that it causes a low level of Less Than Substantial Harm to designated heritage assets.

The comments provided by the Heritage Team pre-date publication of the National Planning Policy Framework of December 2023 and the Adoption of Part One of the JLP 2023 and therefore policy references may be out of date. What has not changed is the significance of the Team's 'Less than Substantial Harm' assessment.

As Members will be aware 'Less than Substantial' does not mean insignificant in NPPF conservation parlance. It simply means it is not 'Substantial' which is the highest level of harm possible. It is nevertheless harm that must be justified if planning permission is to be granted as the presumption is always to avoid harm to a heritage asset/s.

Members are therefore reminded of paragraph 205⁴ and 208⁵ of the NPPF (December 2023) which state:

"205. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

"208. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

The task therefore for Members will be to balance the identified heritage harm against identified benefits arising from the proposal. The heritage implications of the proposed development will be explored in greater detail within the heritage section of this report. The Development Management Service is however of the opinion that the public benefits do outweigh the identified heritage harm in this case (even where considerable importance and great weight is attached to that harm in accordance with legal duty) and will explain why.

The former local plan policy HB01, referred to by the Heritage Team in the comments above is not superseded by AJLP2023 Policy LP19

ECONOMY TEAM: 29 September 2023

*"The Economy team **welcome this proposal to expand the Port One Logistics Park**. The existing permitted units have been completed to a high standard and are fully occupied.*

⁴ formerly paragraph 199 in the preceding NPPF

⁵ formerly paragraph 202 in the preceding NPPF

This development would provide up to 127,333 sqm (1.37m sq ft) of additional floorspace, taking the total to 264,774 sqm (2.85m sq ft). We have been advised that three businesses have already signed up for this additional space (subject to planning permission being granted), with advanced discussions taking place for the remaining space and high levels of ongoing enquiries.

The development would facilitate the creation of 2500 jobs on site, doubling what has been previously estimated. If this permission is granted, we would like a condition to be added that requires the applicant to submit an Employment & Skills strategy to provide more detail on these jobs and how they will endeavour to offer these roles to local people thereby providing a wider economic benefit of the development. This should be developed in association with the Economy team prior to submission.

As Port One has been included in the list of Freeport East Customs sites, we believe that this has the potential to significantly increase the attractiveness of this location to businesses who are involved in importing/exporting, particularly via the Ports of Felixstowe and Harwich, thereby increasing demand for additional development. Businesses who “add value” to the product that is being exported though some form of additive process or production will potentially be able to access financial incentives including customs duty suspension or exemption and simplified import declarations.

The submitted evidence showing demand for logistics floorspace in this area highlights significant regional demand for these types of units, the only concern in this regard is that we would not wish to see the entire site developed for logistics uses. This monoculture of employment use offers limited opportunity for employment in any sector other than logistics/warehousing and is comparatively low value and low skilled employment. We would wish to see some variation in companies locating on site to include manufacturing and production to provide a comprehensive employment offer to a local workforce.

We welcome the high levels of sustainability that have been incorporated into this development, including the electric shuttle bus, EV infrastructure, BREAAAM very good standard and onsite generation of electricity.”

- Michelle Gordon, Corporate Manager, Economy & Business Economic Development & Regeneration Team

COMMUNITIES: 14 August 2023

*“ We have **no comment to the principle** of the proposed development but are pleased that the applicant has engaged proactively with the Parish Councils within the area affected by the proposed development. **This engagement has yielded a series of community infrastructure enhancements that we are pleased to see as offered as mitigation to the impact of the scheme.***

These are detailed below by Parish and we encourage the Local Planning Authority to ensure these are captured with the Section 106 agreement, should permission be granted.

Little Blakenham

*Installation of photovoltaic array commensurate to the electricity usage of the facility and grid connection to the **Little Blakenham Village Hall**. Refurbishment of the same facility to be undertaken by the applicant in agreement with the Parish Council.*

- *Removal of all asbestos within the building and the cladding on the outside*
- *New double-glazed windows and doors. Additional windows and double doors to open out onto the playing field*
- *New roof and ceiling*
- *New floor*
- *New kitchen*
- *New heating system*
- *Additional/improved toilet facilities*
- *New car-parking spaces (at minimum 3) to include disabled carparking on BMSDC land out front of village hall, providing that permission is granted.*

The Parish Council undertake to apply for Community Infrastructure Levy for the above works. The applicant to make up any shortfall between cost for agreed works and funds raised up to a value to be agreed by negotiation in advance of permission being granted. The proposed enhancements will help to secure the future viability of this community facility, thereby facilitating the social cohesion and wellbeing of the community in this Parish.

Officer comment

The applicant cannot reasonably be required ‘to make’ up any shortfall as this is the equivalent of a signing blank cheque. The applicant has however agreed to consider further support.

Great Blakenham

*Installation and supply of roof-mounted photovoltaic array and grid connection to the **Great Blakenham Community Hall** commensurate with the assessed energy demand of the facility. Installation of ground-mounted photovoltaic array and grid connection to the **Great Blakenham Parish Rooms** commensurate with the assessed energy demand of the facility.*

*The proposed enhancements will help to secure the future viability of this community facility, thereby facilitating the social cohesion and wellbeing of the community in this Parish. Gift of land to establish the ‘**Gipping Meadows nature area and public green space**’, being approx. 9.54ha at the land north of Mill Lane, Great Blakenham (bounded by the railway to the northeast and by the River Gipping on the West and South) together with negotiated arrangement for future maintenance of the site and with commuted sums to enable measures to facilitate public use/access as identified by the BMSDC Planning Design and Wellbeing Lead and to protect habitats & species as identified by the Biodiversity Project Manager. The proposed enhancement would secure and improve residents’ access to this green space; access to such spaces being identified as an aim of the BMSDC Wellbeing Strategy.*

Claydon

Installation and supply of roof-mounted photovoltaic array and grid connection to the Claydon Village Hall commensurate with the assessed energy demand of the facility. Supply of design options for redevelopment of the community building at Claydon Recreation Ground to new functions specified by the Parish Council.

The proposed enhancements will help to secure the future viability of this community facility, thereby facilitating the social cohesion and wellbeing of the community in this Parish.

Barham

Installation and supply of roof-mounted photovoltaic array and grid connection to the **Barham Country Park Visitor Centre**. Supply of survey and drawings of the design options for redevelopment of the same facility.

The proposed enhancements will help to secure the future viability of this community facility, thereby facilitating the social cohesion and wellbeing of the community in this Parish.

Bramford

Installation and supply of additional photovoltaic panels contributing to the existing system to the **Lorraine Victory Hall Bramford**.

The proposed enhancements will help to secure the future viability of this community facility, thereby facilitating the social cohesion and wellbeing of the community in this Parish.”

PUBLIC REALM: 16 August 2023

*“As there is no Public Open space included within the application, Public Realm Officers have **no comment to make, aside from noting those of the communities team and in particular with regard to the "Gift" of land to establish the Gipping Meadows nature area and public green space**, being approx. 9.54ha at the land north of Mill Lane, Great Blakenham (bounded by the railway to the northeast and by the River Gipping on the West and South) together with negotiated arrangement for future maintenance of the site and with commuted sums to enable measures to facilitate public use/access as identified by the BMSDC Planning Design and Wellbeing Lead and to protect habitats & species as identified by the Biodiversity Project Manager.*

Members of the Public Realm team are part of cross-council group involved in negotiating the delivery of this.”

PLACE SERVICES ECOLOGY: 23 November 2023

*“**No objection subject to** securing ecological mitigation and enhancement measures”*

Appropriate **conditions** are recommended:

FULL & OUTLINE

- Construction Environmental Management Plan (CEMP) for Biodiversity
- Biodiversity Net Gain Plan (BNGP)
- Wildlife sensitive lighting
- Biodiversity Enhancement Strategy (BDS)

ARBORICULTURAL OFFICER: 6 January 2023

*“This proposal **involves the loss of high value category A trees** (G4) which should be retained if at all possible. If a redesign for this reason is not feasible, and the benefit of the development is considered to outweigh the value of these trees, then significant re-planting in mitigation would be appropriate. Other proposed losses are of less concern as the trees involved have lower value and their removal will have negligible impact within the local landscape.*

*If you are minded to recommend approval, then additional details for protection of the retained trees will need to be provided but this can be dealt with under **condition**.”*

Officer comment

The concern expressed by the Council’s Arboricultural Officer will be explored in greater detail in the Tree Section 4.18 of this report. It is however acknowledged that the development as proposed will result in the loss of number of high value trees. Officers will argue that the extensive mitigation, including the management of the approximately 8.8ha (21.7acres) Gipping Meadow Land for biodiversity enhancement and the massive amount of new on-site tree planting will appropriately compensate for the loss.

CLIMATE CHANGE TEAM: 6 January 2023

“Upon review of the application the following condition must be met: No development shall commence above slab level until a scheme for the provision and implementation of water, energy and resource efficiency measures for the lifetime of the development shall be submitted to and approved, in writing, by the Local Planning Authority.

The scheme must include as a minimum to achieve:-

- Agreement of provisions to ensure the development is zero carbon ready
- An electric car charging point
- Agreement of heating for the office/conditioned areas
- Agreement of scheme for waste reduction

The scheme shall include a clear timetable for the implementation of the measures in relation to the first occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed and thereafter maintained.

REASON: To enhance the sustainability of the development through better use of water, energy and resources reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

The applicant may wish to consider the installation of renewable technologies e.g. solar PV on buildings with the correct aspect.”

Officer comment:

In many ways the comments made above when the application had only just been submitted in respect of the FULL component of the application are now superseded by events in that the application now includes much of what was being sought. (eg: ev. charging and pave coverage). The requirements above do however continue to remain relevant to the OUTLINE component of this application. **Conditions** should be attached.

ENVIRONMENTAL HEALTH (Air Quality): 22 September 2023 (repeated from 31 January 2023)

“I can confirm that I have no comments to make with respect to Local Air Quality Management.”

ENVIRONMENTAL HEALTH (Contaminated Land): 31 January 2023 (repeated 22 September 2023)

“I can confirm that I have no comments to make with respect to land contamination.”

ENVIRONMENTAL HEALTH (Noise etc): 22 August 2023

*“.. **Whilst I do not wish to raise an objection to the proposed development, until the final use and operation of the units are known, it is not possible to advise further on the extent and degree of any mitigation measures (if any). We would therefore recommend the following conditions should approval be granted”***

- Restrict use to Class B8 (warehousing and distribution) and Class E (business) *(please see officer comment below as this suggested condition is considered to be inappropriate for the reason described)*
- Commercial noise attenuation
- Ongoing noise levels
- Assessment and Noise Management Plan
- Ongoing noise management
- Lighting assessment
- Lighting control
- Construction hours
- Construction Management Plan (CMP)

DM Officer comment:

It is **not** considered appropriate to allow unrestricted Class E use/s* here as the application has been submitted and assessed on the basis of B8 uses (Warehouse and Distribution) and so it is considered necessary to restrict the permitted uses to B8 ONLY as other uses within Class E may generate impacts (eg: retail impacts on existing defined centres, highway/traffic flows on the local and trunk road network) that have not been assessed here.

*please note: Class E is defined as:

Use, or part use, for all or any of the following purposes:

- a) *for the display or retail sale of goods, other than hot food, principally to visiting members of the public,*
- b) *for the sale of food and drink principally to visiting members of the public where consumption of that food and drink is mostly undertaken on the premises,*
- c) *for the provision of the following kinds of services principally to visiting members of the public—*
 - (i) *financial services,*
 - (ii) *professional services (other than health or medical services), or*
 - (iii) *any other services which it is appropriate to provide in a commercial, business or service locality,*
- d) *for indoor sport, recreation or fitness, not involving motorised vehicles or firearms, principally to visiting members of the public,*
- e) *for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner,*
- f) *for a creche, day nursery or day centre, not including a residential use, principally to visiting members of the public,*
- g) *for—*
 - (i) *an office to carry out any operational or administrative functions,*
 - (ii) *the research and development of products or processes, or*
 - (iii) *any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.*

PLACE SERVICES (Landscape): 24 November 2023

“I have now looked at the sections, in particular the scale of the planted bunds on the western boundary. The landscape character type identified within the Suffolk Landscape Character Assessment is that of Rolling Valley Farmlands. Which is described having the following characteristics:

- *Gentle valley sides*
Gentle valley sides with some complex and steep slopes
- *Deep well drained loamy soils*
- *Organic pattern of fields smaller than on the plateaux*
- *Distinct areas of regular field patterns*
- *A scattering of landscape parks*
- *Small ancient woodlands on the valley fringes*
- *Sunken lanes*
- *Towns and villages with distinctive mediaeval cores and late mediaeval churches*
- *Industrial activity and manufacture, continuing in the Gipping valley*
- *Large, often moated, houses*

While complex and steep slopes are sometimes a feature, we would assess as the topography in this location as gently sloping valley side, with the land falling towards the Gipping Valley floor. This is confirmed by the dashed line on the section drawings which indicates the existing ground level.

While we appreciate that the bunds have been introduced to help alleviate the visual effects of the development when viewed from the west, we have concerns that they appear to be disproportionate to the scale of the building. The bunds are proposed to be planted with variety of mixed native trees and shrubs which in time will also contribute to the screening of the development. We would therefore recommend that the height of the bunds is reduced by approx. 1-2m and that the western slope could be extended to reduce the overall gradient of the slope allowing it to 'tie in' better with the surrounding ground levels.

*Consideration should also be given to the effects on PRow users (FP W370/021) which passes through the site in an east/west direction between units 11 and 17. Further details of the proposed levels and ecowall should therefore be secured by **condition**.*

PLACE SERVICES (Landscape): 1 September 2023

"Wet wood is a great idea, especially as it's been proposed along the western edge where there were significant tree losses.

The tree species look fine for the wet woodland, generally well adapted to moist soils and some to waterlogged/wet soils. Minor concern on Viburnum opulus as this can do moist but well drained soils, so should be fine on the higher/better drained areas (one for me to watch).

I did raise a concern in my last response (doesn't seem to be on the portal) about removal of an existing water feature, possibly SuDS basins associated with earlier phases, on the Existing Site Plan (Dwg Ref 2242-DE-10-02_B which appears to have been removed from this application. I had asked for clarification which I don't see in the new documents, however I want to be sure you are aware of its removal and that you are satisfied that this has been accounted for in the new scheme?"

Officer comment

These matters can be addressed by condition:

WASTE SERVICES: 23 August 2023

"No further comment" ...beyond those previously offered

OTHERS

ANGLIAN WATER: 22 September 2023

- AW confirms that it has assets in the area
- AW confirms that foul drainage from the development is in the catchment of Ipswich-Cliff Quay Raeburn Water Recycling Centre and there is adequate capacity to accept the expected flow
- Unable to assess the Flood Risk*

*Officer comment:

It should be noted that SCC as the LLFA has assessed the application and is satisfied subject to conditions

- Standing advice on SuDS
- Standing advice on trade effluent

Suggested **Condition**

We have no objection subject to the following condition:

“Condition: Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme.

Reason To prevent environmental and amenity problems arising from flooding”

SUFFOLK WILDLIFE TRUST: 31 August 2023

“ I have re-assessed this application and do not believe this project meets our criteria to provide comment.”

EAST SUFFOLK INLAND DRAINAGE BOARD: 29 August 2023

“ As the site lies mostly outside the Board’s district, we defer to the LLFA. Therefore, the East Suffolk Water Management Board have no further comments to make on the proposed development.”

IPSWICH RAMBLERS Patch 2: 22 December 2022 [sic]

“Application states that rights of way are not affected but Little Blakenham Footpath 21

appears to go through the middle of this development. This footpath starts from the road opposite Broomvale Farm. Ipswich Ramblers **object** to the application on the grounds that it will cause the loss of footpath 21.”

Officer comment:

The encroachment of development onto the line of FP 21 within the original layout was noted and the concern expressed by the Ramblers Association was shared by officers. The layout was subsequently amended to ensure that the route will remain unobstructed in the event of planning permission being granted and built-out. The layout has been amended not only to ensure that the designated route is unobstructed but has also been incorporated into a 23m. wide walkable public green corridor through the heart of the development . This will reinforce accessibility to the countryside beyond but the walk will of course now pass through the Port One development which will be visible to users. That said it will not take long for users of this section of FP21 to get out back into the open countryside.



figure 10: **FP21 from designated FP map**



figure 11: **proposed 'green corridor' to accommodate FP21 in the proposed layout**

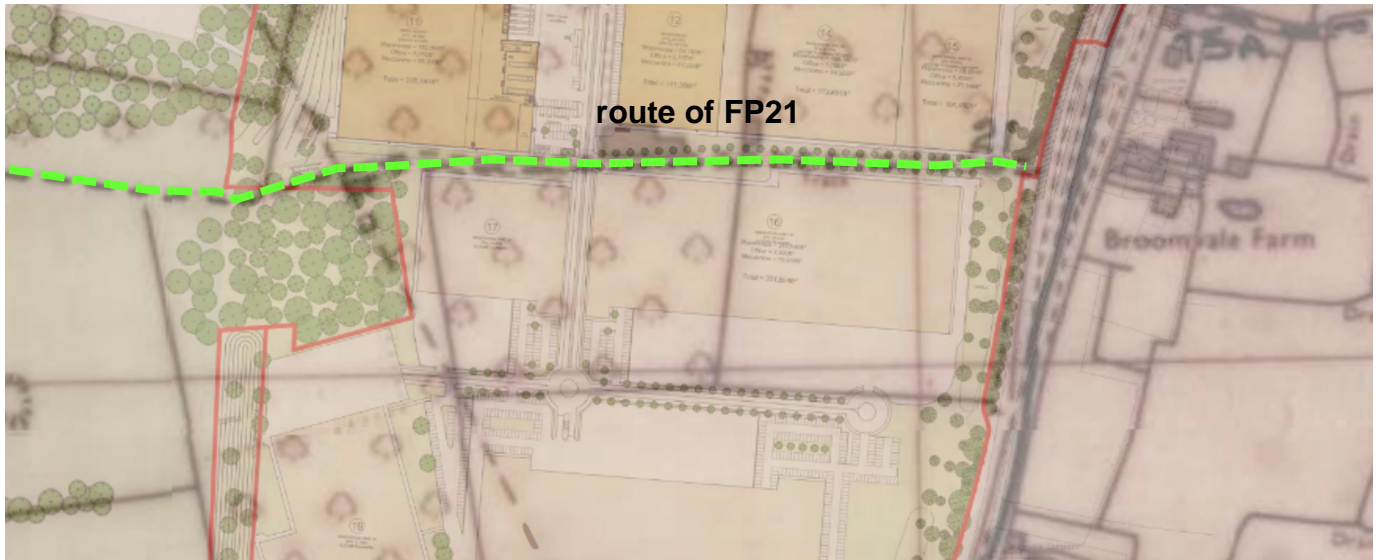


figure 12: **Image in figure 11 superimposed over the image in figure 10 as a semi-transparent layer to allow comparisons of routing to be seen**

STOWMARKET RAMBLERS: 19 January 2023

“Stowmarket Ramblers (footpath committee) will not be sending any comments on the above application.”

BRITISH HORSE SOCIETY: 19 January 2023

The route of a public right of way, Footpath 21 runs through the proposed site. This Footpath leads to other Footpaths and a Bridleway routes (Footpaths 24, 27, 28 and Bridleway 30). The increase in the volume of traffic this proposal would generate, will place users at risk. Therefore, the proposals are contrary to NPPF paragraph 110B [note: now 114b] which states, ‘safe and suitable access to the site can be achieved for all users.’

The British Horse Society would encourage the upgrade of the current Footpaths 21 & 24 to Bridleways. As Bridleways the routes would benefit more public users, including walkers, cyclists, and horse riders.

Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise, this is important when considering that physical inactivity is associated with 1 in 6 deaths in the UK (All Our Health, Public Health England, 2022).

Although the benefits of health and wellbeing are experienced by both men and women horse riders, the majority of those who ride regularly are women, and a sizeable proportion are over forty-five years of age. This is a valuable aspect of horse riding, since at National level, women in general have been

identified as a social group with below average levels of participation in sport and physical exercise.

(Sport England 2007)

There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the Changing Lives through Horses initiative.

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable; however, it is simply because people have nowhere else to exercise their horses. An additional factor is that the network is fragmented, and roads are often the only available links between one Right of Way and the next.

Thank you for taking the time to consider this response.”

Officer comment:

The comments made above are noted but neither the local highway authority nor the public rights of way team have required the upgrading of the routes identified to bridleways.



figure 13: **Location of Bridleway 30**

Furthermore neither has expressed safety concerns in respect of the continued and unobstructed routing of FP21 through the proposed Port One development.

B: Representations

At the time of writing this report (29 December 2023) the following public comments had been received:

23 December 2022 – 9 January 2023

Objections from NINE addresses

11 August 2023 – 21 August 2023

Objections from SIX addresses

Objections include the following:

Inadequate access

Increase in pollution (non-specific)

Light pollution

Drainage

Conflict with District Plan

Scale

Odour

Inappropriate in a conservation area [?]

[Officer comment: The site is neither within or near a designated conservation area]

Building work

Ecological impacts

Design

Dominating /overbearing

Health & Safety

Overlooking

Overdevelopment

Sustainability

Landscape impact

Out of character

Strain on existing community facilities

Landscape impact

Loss of open space

Inadequate public transport

Noise

Traffic

Highway issues (junction 52)

Trees

Impact on public footpath

(Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation.)

The full texts of comments received are available for viewing on line

RELEVANT PLANNING HISTORY (high-level summary of key decisions)

REF: DC/ 21/05820	Application for approval of Reserved Matters following approval of Outline Planning Permission DC/20/03891 dated: 17/02/2021 - Appearance, Landscaping, Layout, and Scale in relation to the Construction of Phase 6 Unit 6 Class B8 Warehouse buildings including ancillary office space, production areas (Class E(g)) and car parking deck.	DECISION: GRANTED 02.02.2022
REF: DC/21/04358	Application for approval of Reserved Matters following approval of Outline Planning Permission DC/20/03891 dated: 17/02/2021 - Appearance, Landscaping, Layout, and Scale in relation to the Construction of Phase 8 Units 1 and 2 Class B8 Warehouse buildings including ancillary office space, production areas (Class E(g)) and car parking deck.	DECISION: GRANTED 03.02.2022
REF: DC/21/02697	Full Planning Application - Extension of estate road and construction of part of carpark and service yard, with related landscaping to service unit 3.	DECISION: GRANTED 24.06.2021
REF: DC/21/02067	Submission of details (Reserved Matters) following Permission DC/20/03891 dated 17/02/2021 - Appearance, Landscaping, Layout and Scale for Construction of Phase 3 / Unit 3 Class B8 Warehouse building including ancillary office space, with car parking and loading / unloading areas, boundary landscaping and continuation of estate road.	DECISION: GRANTED 10.06.2021
REF: DC/20/01175	Application for Outline Planning Permission. (Access to be considered) Extension to Port One Business and Logistics Park (as permitted under ref. 2351/16 and varied by ref. 1755/17), together with associated works including drainage lagoons, ecology mitigation and landscaping	DECISION: GRANTED 15.04.2021
REF: DC/20/03891	Application under Section 73 of the Town and Country Planning Act relating to Planning Permission 2351/16 previously varied by 1755/17 for the variation of Conditions 20	DECISION: GRANTED 17.02.2021

(Proposed access road details) and 26 (Off road cycle route improvements)

REF: DC/19/01793	Submission of details under Outline Planning Permission 2351/16 (Varied by Section 73 permission 1755/17) for Appearance, Landscaping, Layout and Scale of Phase 2 extending estate road approved under DC/18/01897 to eastern & central parts, provision of main services & balancing lagoon & Phase 4 for central warehouse unit plot.	DECISION: GRANTED 23.10.2019
REF: DC/19/01827	Submission of Details under Outline Planning Permission 2351/16 (Varied by Section 73 permission 1755/17) for Appearance, Landscaping, Layout and Scale of Phase 1 Access Works	DECISION: GRANTED 10.07.2019
REF: 1755/17	Application for variation of condition 20 following grant of planning permission 2351/16: "Application for outline planning permission (including access, all other matters reserved) for development of business and logistics park to provide commercial floorspace principally within Use Classes B1 and B8, to include access onto the B1113 Bramford Road and a secondary means of access via Addison Way, together with the provision of estate roads and ancillary parking, servicing and landscaping" to enable revised details for proposed accesses	DECISION: GRANTED 29.10.2018
REF: 2351/16	Application for outline planning permission (including access, all other matters reserved) for development of business and logistics park to provide commercial floorspace principally within Use Classes B1 and B8, to include access onto the B1113 Bramford Road and a secondary means of access via Addison Way, together with the provision of estate roads and ancillary parking, servicing and landscaping.	DECISION: GRANTED 17.11.2016

PART THREE follows....

PART THREE – ASSESSMENT OF APPLICATION

1.0 The Site

1.1 The application site is bounded on its:

- east side by the Bramford Road;
- south side by Pound Lane;
- west side by the Blakenham Estate, and;
- north side by units constructed as Phase 1 of the Port One development, south of the new industrial estate road, Blackacre Road.

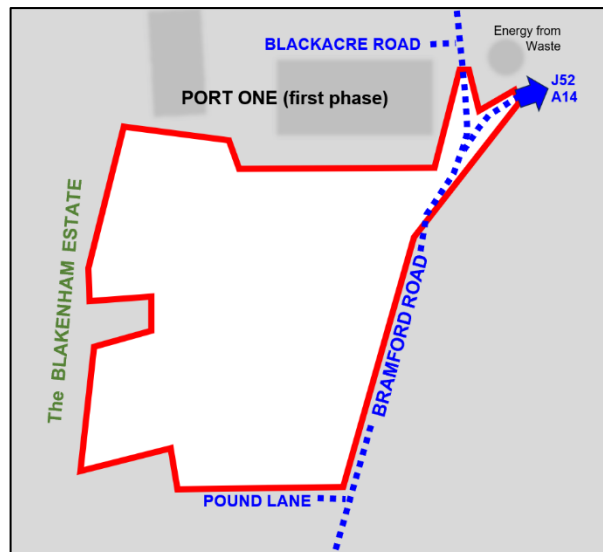


figure 14: **Boundaries to application site**

1.2 The northern part of the site has generally been scraped and the resultant spoil has been formed into heaps at points across it.

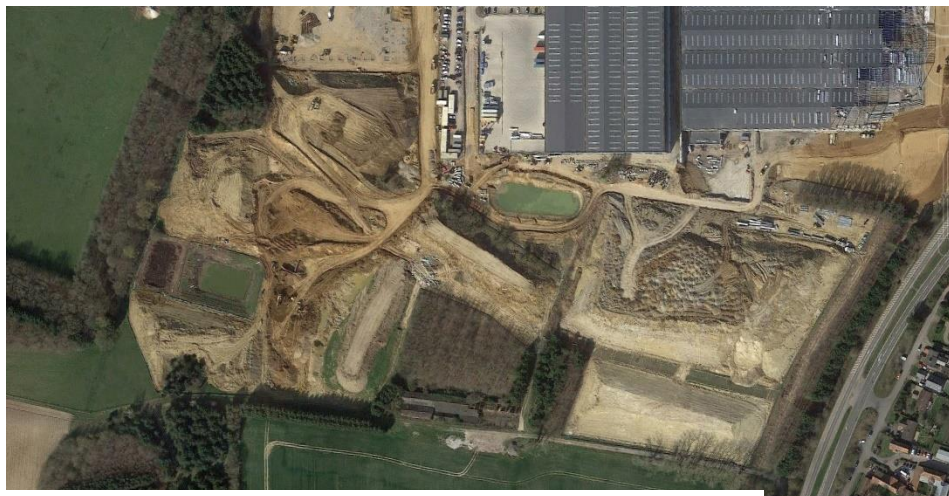


figure 15: **Aerial view of northern part of the site**

- 1.3 The majority of the remaining land within the site to the south is untouched and grassed.
- 1.4 The site boundary on the west side has been drawn to exclude a small pocket of existing woodland and therefore its future is not presently in question as part of the current proposal.



figure 16: **Aerial view of the southern part of the site**

- 1.5 The site's frontage with Bramford Road is presently heavily characterised by mature trees and hedgerow, whereas its Pound Lane frontage is more open albeit at an elevated level as Pound Lane is in cutting.



figure 17: **Bramford Road frontage (on left)**

Energy from Waste plant in the distance (right)



figure 18: **Pound Lane frontage to site** (on right)

2.0 Surroundings

2.1 The site is skirted variously by three broad types of environment.

West : open countryside and parkland
North and south commercial development

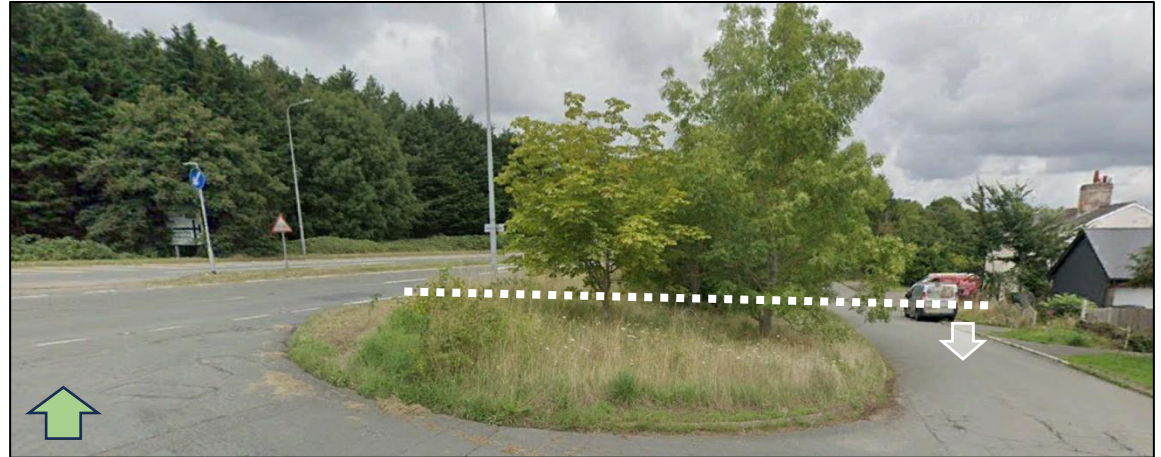
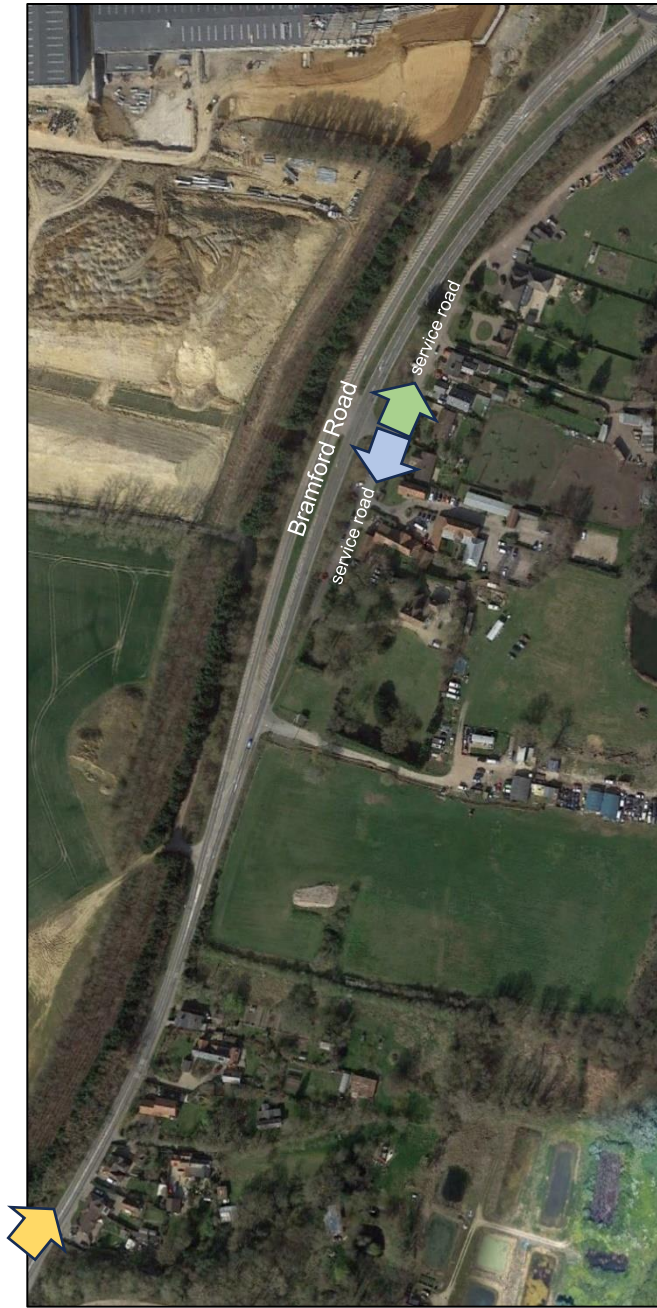


figure 19: **Port One (phase 1) development**
now advanced beyond that visible

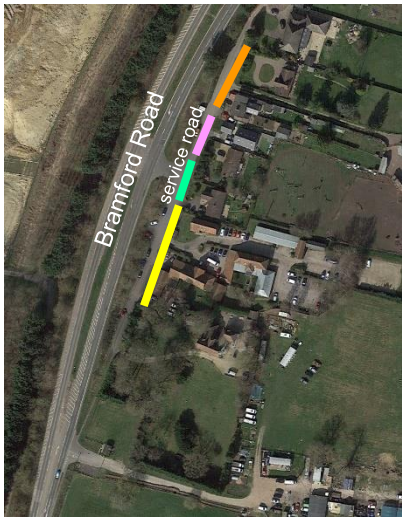


figure 20: **Adjacent tomato growing building** (south of application site)

East: residential (ribbon development on east side of Bramford Road) and business (images overleaf)



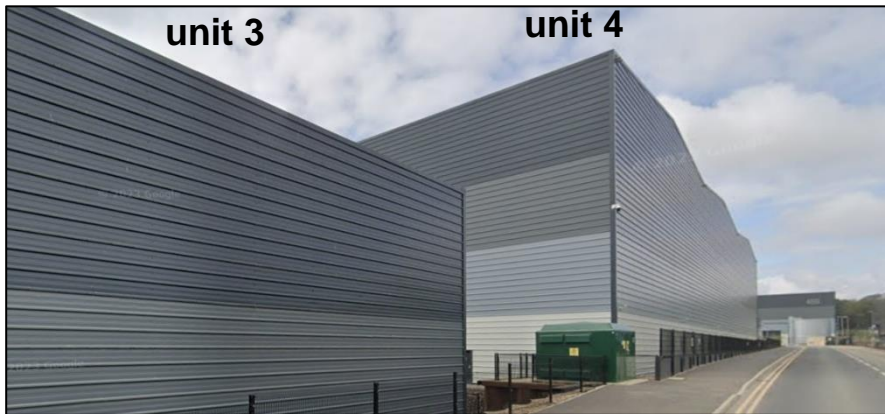
figures 21: **Bramford Road Frontage and existing dwellings opposite**



figures 22: **Bramford Road Frontage and existing properties opposite** (residential and business)



figures 23: **Other commercial development in the area**



figures 24: Buildings within Port One, Phase One



figures 25: Buildings within Port One, Phase One

3.0 Description of the Proposal

- 3.1 The overall application site measures some ha.
- 3.2 The Gipping Meadow Land measures some ha.
- 3.3 The FULL application comprises the erection of three warehouse units as follows:

	Gross floorspace (B8)	Gross floorspace (mezz)	Gross floorspace (ancillary office)	TOTAL	Overall building height
UNIT 5	164,278sq.ft.	72,947sq.ft.	6,536sq.ft.	243,761sq.ft.	17.5m.
UNIT 11	152,364sq.ft.	68,030sq.ft.	4,000sq.ft.	224,394sq.ft.	17.5m.
UNIT 12	84,165sq.ft.	22,034sq.ft.	5,167sq.ft.	111.366sq.ft.	17.0m.
TOTAL sq.ft	400,807sq.ft.	163,011sq.ft.	15,703sq.ft	579,521sq.ft	
TOTAL sq.m.	37,236sq.m	15,144sq.m	1,459sq.m.	53,839sq.m	

- 3.4 Also included is access, layout, estate roads, parking drainage and landscaping.
- 3.5 The OUTLINE application comprises the formation of SIX, B8 warehouse plots. Indicative building

details are as follows:

	Gross floorspace (B8)	Gross floorspace (mezz)	Gross floorspace (ancillary office)	TOTAL	Overall building height
UNIT 14	149,166sq.ft.	19,525sq.ft.	5,000sq.ft.	173,691sq.ft. 16,136sq.m.	no indicative details
UNIT 15	78,485sq.ft.	20,546sq.ft.	5,425sq.ft.	104,456sq.ft. 9,704sq.m.	no indicative details
UNIT 16	249,646sq.ft.	79,518sq.ft.	2,500sq.ft.	79,518sq.ft. 7,388sq.m.	no indicative details
UNIT 17	no indicative details	no indicative details	no indicative details	no indicative details	no indicative details
UNIT 18	no indicative details	no indicative details	no indicative details	no indicative details	no indicative details
UNIT 19	no indicative details	no indicative details	no indicative details	no indicative details	no indicative details
Note: there is no UNIT 13					

3.6 All matters save for ACCESS and LANDSCAPE are RESERVED.

3.7 Constraints

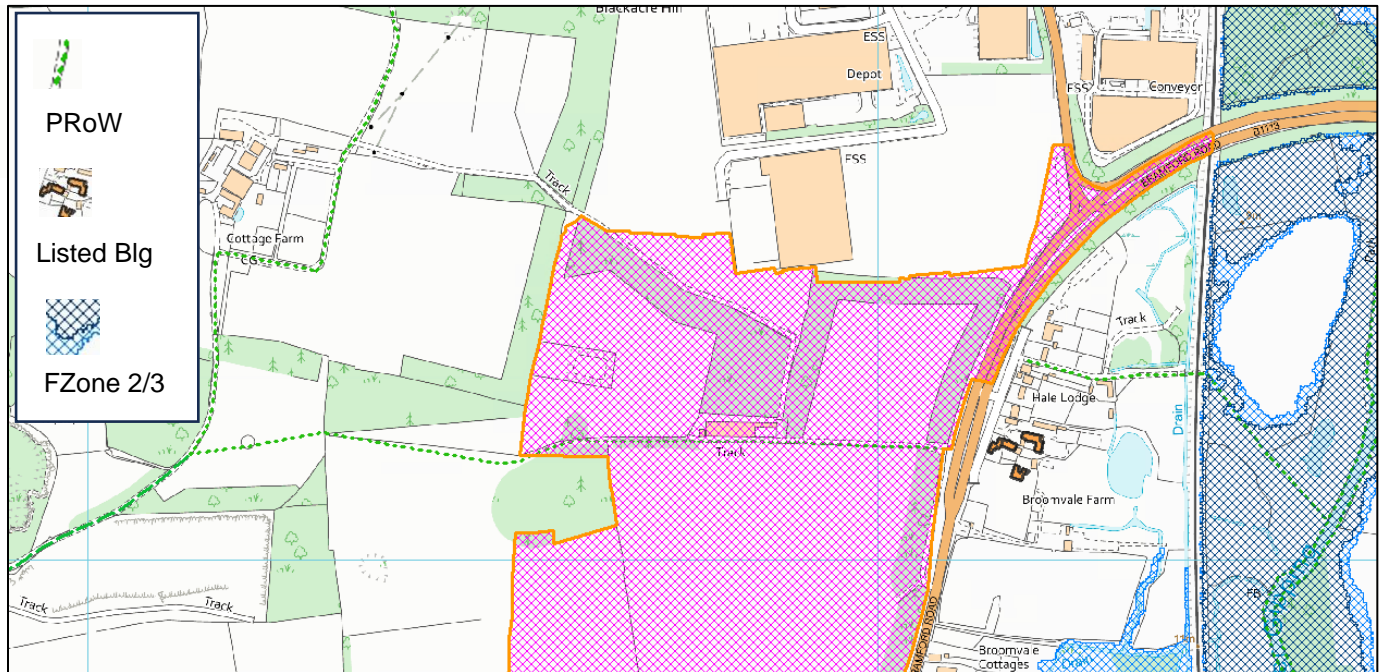


figure 26: **Constraints (northern part of site)**

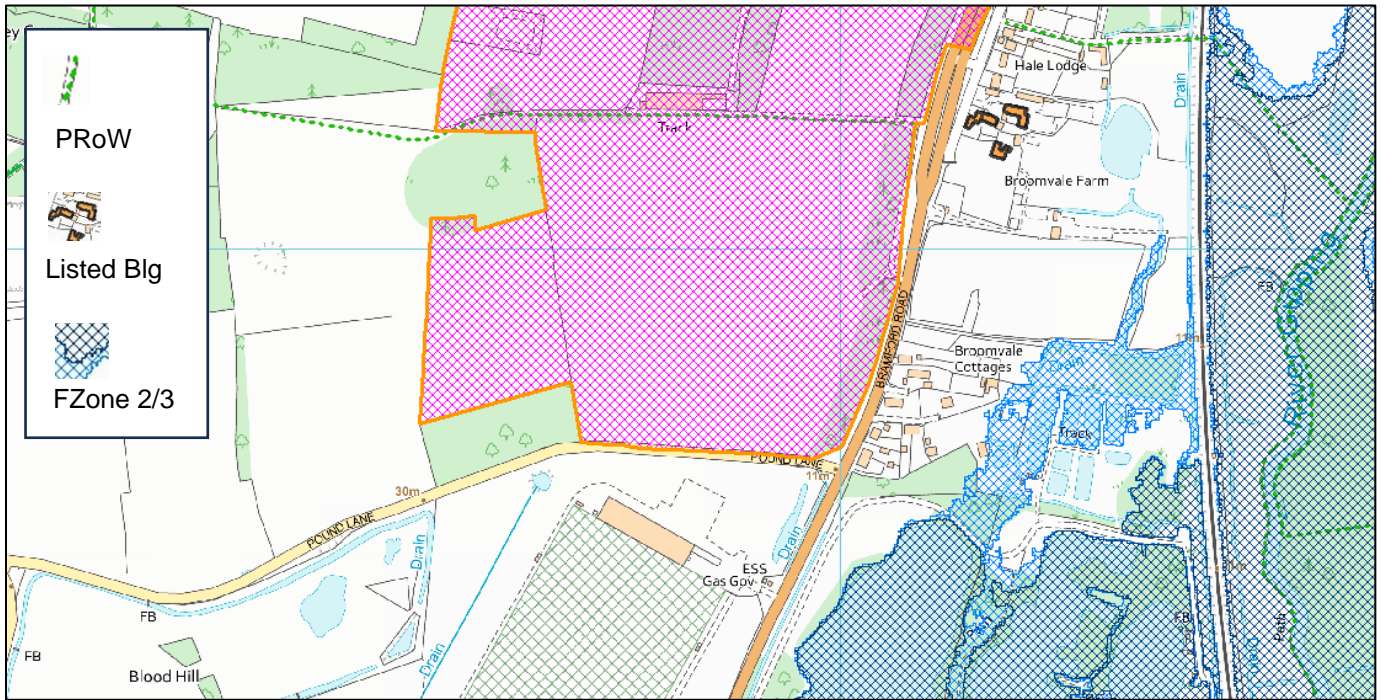


figure 27: **Constraints (southern part of site)**

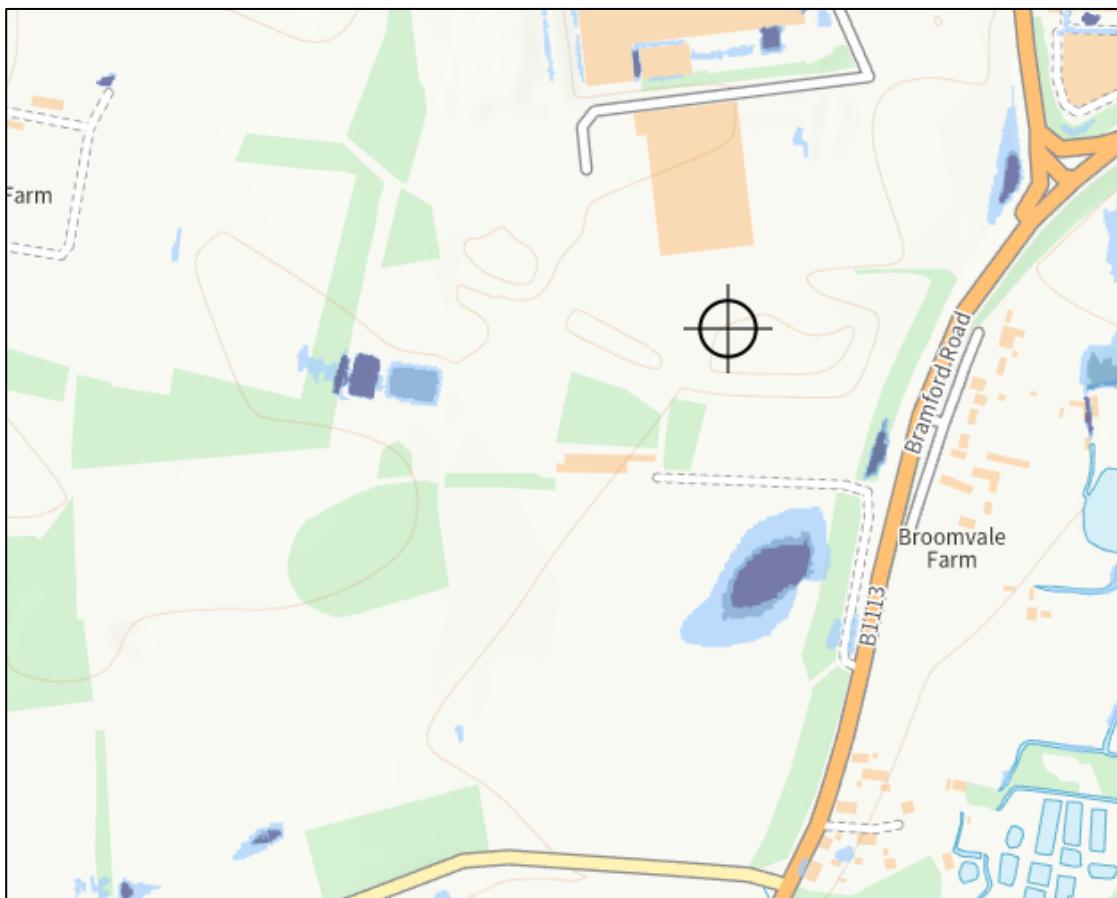


figure 28: **Surface water flood map**



4.0 The Principle of Development

4.1. Although the site is located outside of:

- The defined settlement boundary for Great Blakenham/Little Blakenham within what is ordinarily considered to be countryside in land use policy terms; and,
- the defined Gipping and Claydon Strategic Employment Area. (Gipping and Claydon Business Site). (Adopted JLP 2023: Table 6 Strategic Employment Sites)

It does:

- (i) Presently enjoy the benefit of various planning permissions for development purposes save for five small pockets (figure x) ; and,
- (ii) Represent the expansion of an existing, very successful logistics park; and,
- (iii) Sit on the A14 corridor and is considered to satisfy SP05 of the JLP. – this, in the opinion of officers, being the most important policy for the determination of this proposal .,

4.2 The ‘materiality’⁶ of these factors is now considered in turn.

4.3. The principle of large sheds/employment/logistics development being acceptable on this site has already been established in large part by three earlier planning permissions (*and subsequent associated permissions*). Two for logistics park development (*two permissions for Phase 1 development at Port One*) and another for two large industrial scale indoor tomato production greenhouses. (*of which one was built and operated until the gas price crisis in 2022 halted production. It is rumoured that new owners may be about to re-commence production*).



figure 29: **Existing adjacent tomato production building**

⁶ The extent to which they are a valid planning consideration when determining the merits of a planning application



3655/13

Full: Erection of two greenhouses and provision of pipeline to Gt Blakenham Energy from Waste Plant as varied by DC/19/04981

granted 03.08.2015

DC/22/06288

Hybrid current application



2351/16

Outline: Business and logistics park, as varied by 1755/17 & DC/20/03891

granted 17.02.2021

DC/22/06288

Hybrid current application



DC/20/01175

Outline: extension to logistics park

granted 15.04.2021

DC/22/06288

Hybrid current application

figures 30: Relevant planning permission/adjoining

2351/16

Outline: Business and logistics park, as varied by 1755/17 & DC/20/03891

granted 17.02.2021


DC/20/01175

Outline: extension to logistics park

granted 15.04.2021

DC/22/06288

Hybrid current application

 areas outside of previous permissions

3655/13

Full: Erection of two greenhouses and provision of pipeline to Gt Blakenham Energy from Waste Plant as varied by DC/19/04981

granted 03.08.2015



figures 31: **Material planning permissions**

- 4.4 The application site is unquestionably within the A14 Strategic Transport Corridor⁷ and therefore SP05 of the JLP is a relevant material planning consideration.
- 4.5 Port One is already a very successful logistics hub that serves not just Freeport East but the UK. It has established a strong presence within the competitive logistics market.
- 4.6 The significant and ongoing inward investment has seen global businesses locate in Mid Suffolk. Much of this is new business, new jobs and new opportunities rather than businesses moving within the District.
- 4.7 Port One and the application site enjoy crucial locational and functional advantages that make it attractive to the logistics industry. These include:
1. Adjacency and very easy access to the A14 and its wider connections to the UK's strategic motorway/road network making for easy access by hgvs.
 2. Proximity to the east coast ports of Felixstowe and Harwich (Haven Gateway)
 3. Free Port East status attracting huge logistics movements on the A14 to/from Felixstowe which is Britain's largest and busiest⁸ container port. Imports and exports through Felixstowe are vital to the UK economy and the availability to consumers of goods and products from around the world.
 4. Port One is a Freeport East 'Customs' site⁹
 5. *Clustering* of logistics businesses within an established high quality logistics park providing market investment confidence.
 6. MSDCs supportive approach to business and its own proactive intervention in the shape of Gateway 14 attracting investment into the District and raising its UK commercial profile. (*The Range at Gateway 14 occupies the UK largest warehouse*)

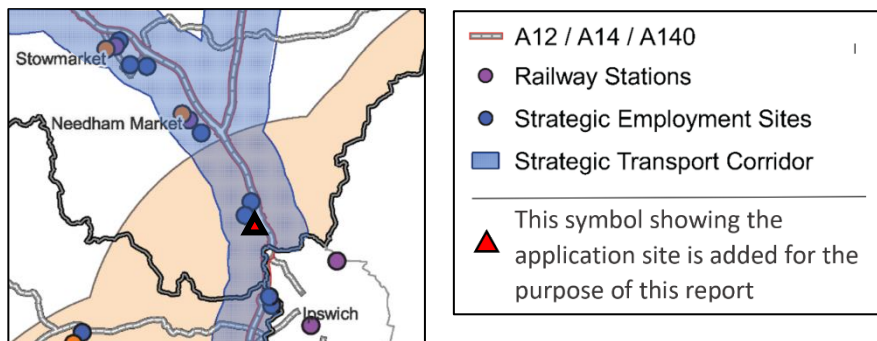


figure 32: **Extract from Key Diagram (JLP 2023)**

⁷ JLP Glossary **Strategic transport corridors**

Strategic transport corridors are identified on the Key Diagram, and are defined as 2km from the A12, A14 and A140.

⁸ 42% of all UK container trade. Institute of Civil Engineers

<https://www.ice.org.uk/what-is-civil-engineering/what-do-civil-engineers-do/felixstowe-docks#:~:text=Felixstowe%20is%20the%20UK's%20largest%20and%20busiest%20container%20port%20handling,between%20Hamburg%20and%20Le%20Havre.>

⁹ A Freeport customs site (also known as a 'free zone') is a secure, enclosed customs zone where some of the normal tax and customs rules don't apply.

4.8 The figure (below left) shows how the A14 provides strategic connectivity to the UK's motorway/trunk road network from the port of Felixstowe. It is Port One's position on the A14 close to Felixstowe that has proved so attractive to the logistics industry.

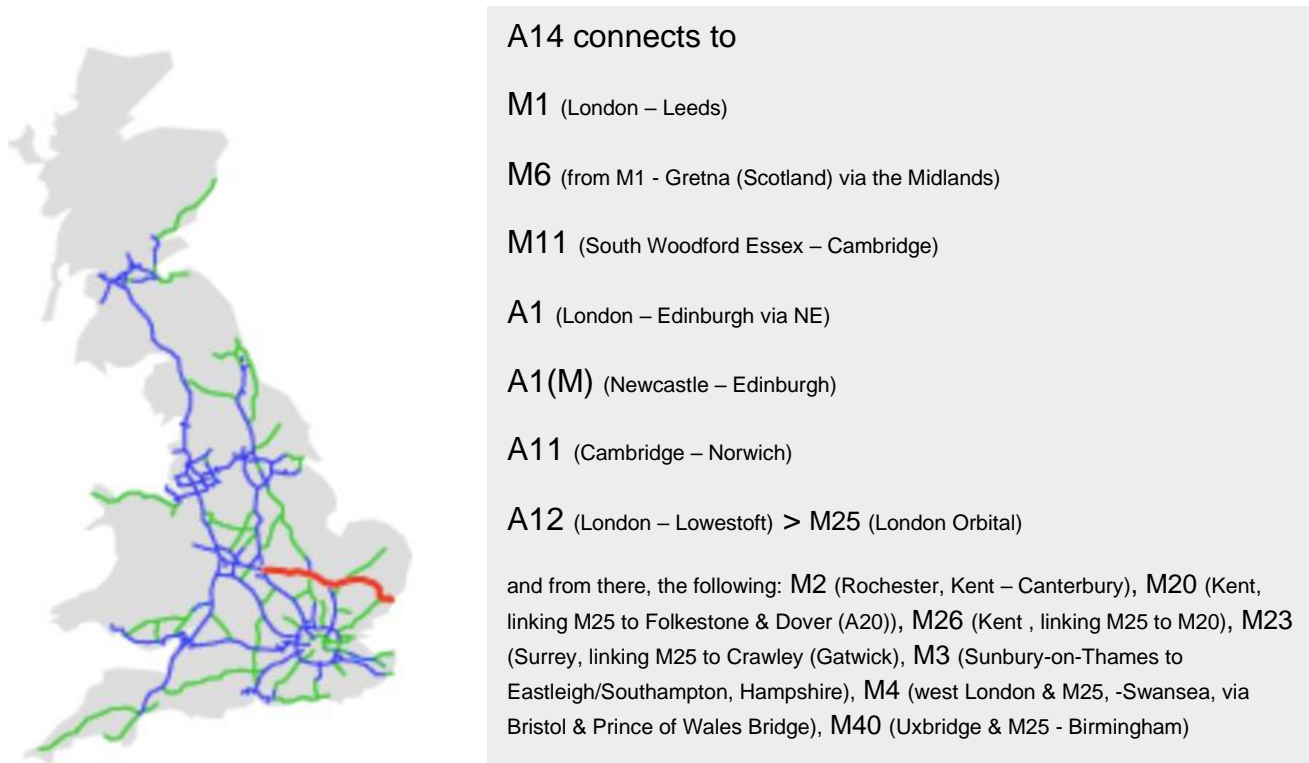


figure 33: **UK's motorway strategic trunk road network and A14 connectivity**

4.9 Assessment against SP05 Criteria

(NOTE: text in **blue** is the text of each individual criterion under SP05, Part 5, criterion a) to f) [inclusive].

Officer analysis of the application in regard to the extent to which it complies (or not) with that specific criterion follows immediately below each individual criterion in turn)

4.9.1.0 **Criterion a)**

“The applicant demonstrating that any proposal is deliverable and would enhance provision which cannot be accommodated on existing strategic employment sites; “

- 4.9.1.1 **Officer analysis of the application in the context of criterion a)**
- 4.9.1.2 The applicant has a proven track record of delivery at Port One and has been able to build units to specific tenant's requirements rather than engage in speculative construction. The Port One units approved under previous permissions as units 1, 2, 3, 4, 7, 8, 9,10 have all been completed and are occupied.
- 4.9.1.3 These have not satiated demand.
- 4.9.1.4 The applicant presently has prospective tenants lined up to occupy the new floorspace within the detailed element if it is approved and has others interested in the 'outline' floorspace. This interest appears not to have prevented the massive Range unit coming forward at Gateway 14 with others under discussion and picks up from the success of similar uses on the former sugar beet site at Sproughton (which includes Amazon and La Doria).
- 4.9.1.5 This suggests that Curzon de Vere knows its market and its focus on providing purpose-built, high quality, state of the art, sustainable facilities for the burgeoning logistics industry in the ideal location is one that is being well received by the Industry.
- 4.9.1.6 As a Freeport Customs Area Port One now has an operational advantage that cannot be reproduced elsewhere in the District. The ability to benefit from the duty charges relief that it enjoys now cannot be reproduced. It is designed, set up and operates as a Customs Area logistics park with infrastructure to suit and as such cannot be accommodated on other general business parks. It has a Unique Selling Point (USP) that means it satisfies the SP05 requirement that it cannot be accommodated elsewhere.
- 4.9.1.7 It is understood that the Customs Area status can be extended to embrace expanded parts of Port One (if granted planning permission) provided that they meet the functional requirements prescribed by the Government (eg: appropriate site security). It is the intention of the operators Curzon de Vere to ensure the expanded areas if approved (by the Council) will meet the requisite standards to ensure they too fall within the Customs Area status
- 4.9.1.8 The Allocation of the Gipping and Claydon Business site as a Strategic Employment Area in the JLP from the Local Plan represents an historic carry forward of employment sites. The allocation has now been realised and the demand for additional logistics space in Mid Suffolk along the A14 corridor is far from satisfied.
- 4.9.1.9 SP05 is designed specifically to ensure that appropriate employment uses and floorspace continues to be supported as allocations within the previous Local Plan get

built-out. Its emphasis through the application of a criteria-based approach is to ensure the right type and quantity of space goes to the right place along the A14 corridor.

- 4.9.1.10 Members will have noted the comments of the Council's Strategic Planning Manager in respect of the principle of the use being supportable, as expressed in his formal consultation response as set out earlier in this report. With the *'ink'* on the AJLP2023 *'having only just dried'* his advice is a critical material planning consideration.
- 4.9.1.11 His comments in respect of the need for the proposed development to satisfy the detailed criteria within SP05 are noted and this section of the report sets out to analyse the merits of the proposal against each. It will be demonstrated why officers are of the opinion that the proposal does meet all the relevant criteria.
- 4.9.1.12 The applicants submitted economic statement indicates that there is significant (*but undefined*) demand for commercial floorspace on the A14 corridor.
- 4.9.1.13 The nearby Strategic Employment site that is Gateway 14 for example has Freeport East commitments and associations that means it needs to provide a mix of commercial business floorspace and cannot focus on distribution uses, whereas that is Port One's *raison d'être*.
- 4.9.1.14 The view of the Council's Corporate Manager, Economy & Business attracts substantial weight, particularly when she states:

"As Port One has been included in the list of Freeport East Customs sites, we believe that this has the potential to significantly increase the attractiveness of this location to businesses who are involved in importing/exporting, particularly via the Ports of Felixstowe and Harwich, thereby increasing demand for additional development. Businesses who "add value" to the product that is being exported though some form of additive process or production will potentially be able to access financial incentives including customs duty suspension or exemption and simplified import declarations.

The submitted evidence showing demand for logistics floorspace in this area highlights significant regional demand for these types of units.....(a)... [see paragraph 4.9.1.15 below for missing text]

We welcome the high levels of sustainability that have been incorporated into this development, including the electric shuttle bus, EV infrastructure, BREAAAM very good standard and onsite generation of electricity."

- 4.9.1.15 Members are advised that she does add a cautionary note at (a) above when she says:

"...the only concern in this regard is that we would not wish to see the entire site developed for logistics uses. This monoculture of employment use offers limited

opportunity for employment in any sector other than logistics/warehousing and is comparatively low value and low skilled employment. We would wish to see some variation in companies locating on site to include manufacturing and production to provide a comprehensive employment offer to a local workforce”.

4.9.2.0 Criterion b)

“All proposals demonstrating adequate highway capacity and access with sufficient on-site parking”

- 4.9.2.1 The previous phase of development at Port One was carefully laid out to ensure adequate parking is provided within a wider context of actively encouraging the use of alternative sustainable means of travel. (such as foot, cycle, public transport and ev). No parts of the existing Port One estate road system appear to experience routine on-street parking such is the availability of sufficient off-street spaces to meet the demand from employees. The uses on site, by their nature do not attract many visitors and so the demand for parking spaces is predictable. The parking section of this report will explore in greater detail the justification for the mathematics used to calculate the provided number of parking spaces.
- 4.9.2.2 The current application follows the same principles with an emphasis on providing enhanced pedestrian and cycle connectivity and an expanded free electric shuttle mpv service for access to and from work for staff from local pick-up points with a balanced number of car spaces .
- 4.9.2.3 Despite the applicant’s highway consultant’s assertions to the contrary, the application site is poorly served by easily accessible (within 400m of a bus stop) bus connectivity. This being a single once a day bus route (route 988) and it is this paucity of public transport connectivity this fact has informed the applicants approach to building in sustainable travel options from day one of the Port One project. It has also prompted the applicant to offer local communities (*parishes of Little Blakenham, Great Blakenham, Barham, Claydon, Bramford*) pre-organised free access to the electric shuttle vehicles (during off-peak staff collection peaks) via a S106 commitment. (details of the community access scheme will require working up within the S106 in discussion with the 5 Parish Councils if Members are minded to approve the application.
- 4.9.2.4 Those discussions have already been taking place in terms of developing an embryonic model.
- 4.9.2.5 An important component of the current proposal is the improvement to the junction 52 roundabout that will increase its capacity. In early consultation responses a number of Parish Councils expressed objection to the proposal as submitted on the grounds of likely adverse traffic impact at junction 52.

- 4.9.2.6 The proposed improvements have not only satisfied Suffolk County Council, as local highway authority that the proposed development can now be accommodated on the local and strategic network but the amendments have also assuaged the initial concerns of those parish councils most impacted by the A14 and junction 52.
- 4.9.2.7 The design of the proposed new access into the development from the Bramford Road has been amended several times as required by Suffolk County Council Highways in order to provide a satisfactory arrangement. The design as now presented will provide not only a safer crossing point for pedestrians and cyclists (see access section of this report for fuller details) but will relieve the existing Port One access whilst continuing through traffic management measures and road geometry to restrict hgv movements along peripheral sections of Bramford Road and directing it towards junction 52 and the A14.

4.9.3.0 Criterion c)

“Ensuring provision of accessibility to public transport, including walking and Cycling provision”

- 4.9.3.1 Phase 1 has already provided a number of improvements that have improved localised pedestrian and cycle accessibility and connectivity. The current proposal includes further improvements that will extend that connectivity farther helping to encourage safer active travel.
- 4.9.3.2 Rather than look to fund bus route improvements with public transport contributions, the applicants have chosen to expand the use of electric shuttle vehicles at Port One in the shape of two 15-seaters to add to the existing 9-seater. These will provide free transport for employees to and from work across the various shifts. (presently three circular journeys per shift).
- 4.9.3.3 In what is believed to be a unique initiative in the District, Curzon de Vere has offered to work with local parish councils and the District Council develop free community access to journeys using the electric shuttle vehicles during off-peak times. A number of the parish councils in the vicinity 'have welcomed such an initiative. Details have yet to be crystalised but the principle of working together to develop such a system with the applicant where feasible can be included in any Section 106 Agreement that might be required, if Members are minded to grant planning permission.

4.9.4.0 Criterion d)

“The site design and layout being sensitive to the surroundings, including any landscape, heritage and biodiversity assets; “

- 4.9.4.1 Landscape and heritage impacts are discussed in detail later in this report at sections 4.21 and 4.18 respectively.

- 4.9.4.2 In summary, it is acknowledged that the proposed development will cause some harm to the existing landscape and designated heritage assets. In the case of the heritage harm which is described as a low level of Less Than Substantial Harm by the Heritage Team, this is outweighed by the public benefits that arise from the development if approved
- 4.9.4.3 In terms of landscape impact the development will change the character of parts of the landscape hereabouts, although Phase 1 of the Port One Development, the associated works and the large adjacent tomato growing unit have to some degree already done that. Regrading of ground levels to lower them in places will have the effect of reducing the mass of the proposed buildings in the landscape and additional landscape buffer planting will soften the impact of the development in the landscape.
- 4.9.4.4 Members familiar with the history of Port One, will recall that most concern related to the impact of the development on long views and the colour scheme approved then (and repeated here) was devised to disguise the mass of the buildings.

4.9.5.0 Criterion e)

“Prioritisation being given to development on previously development land; and “

- 4.9.5.1 A significant part of the application site cannot be considered to be Previously Developed Land (PDL) in that it is presently open land that has not been developed and is ‘greenfield’.
- 4.9.5.2 This however is not fatal to the prospects of success for the application at hand. Criterion e) requires prioritisation to be given to development on previously developed land but it does not say all development must be exclusively on PDL.
- 4.9.5.3 Here we have an existing highly successful business that is seeking to expand. There is no PDL available adjacent to it.
- 4.9.5.4 That said parts of what is presently open land have already benefitted from planning permission for development purposes and so the acceptability of the principle of development on those parts has already been conceded or otherwise established.
- 4.9.5.5 Members will see from the aerial images overleaf (figure 34) that construction of those parts of Port One, Phase 1 that have been completed and associated works have already transformed much of the landscape across a central swathe of the application site such that it no longer can be characterised as open countryside.
- 4.9.5.6 Much of that land has the benefit of planning permission to further expand Phase 1 under the planning permission reference DC/20/01175 and so it is not appropriate to see these elements effectively being ‘greenfield’.

- 4.9.5.7 The planning history of the application site is such that it is no longer a realistic proposition to expect it to remain unbuilt upon.
- 4.9.5.8 As with much in planning the extent to which the development satisfies (or not) criterion e) is a matter of interpretation and judgement. However, even if Members were to conclude that the application was not wholly or partly PDL the effect of this element of SP05 is not to preclude appropriate sustainable development that otherwise satisfies all the other elements of SP05. It is unlikely that every site on a A14 corridor suitable for sustainable employment growth will be previously developed land. To some degree Members need to be conscious of the interplay between SP05 and other relevant AJLP2023 policies – such as LP09 Supporting a Prosperous Economy.



figure 34: **Recent aerial timelapse from 2017 of application site and surroundings**

4.9.6.0 Criterion f)

“All new buildings demonstrating a high standard of design, by having regard to the relevant policies of the Plan. “

4.9.6.1 These are explored in detail within section 4.12 of this report

4.9.6.2 Officers are of the opinion that the proposed design (FULL APPLICATION) meets the required standard and is an acceptable progression of the design philosophy and execution used within Phase 1. Design has been taken here to include, accessibility, environment, sense of place, sustainability etc. That is to say - the wide sense of 'design quality'.

4.9.6.3 In terms of the OUTLINE application the details submitted pursuant to Reserved Matters (if outline planning permission is granted) are expected to follow the same character.

4.10.0 Access

4.10.1 It is proposed to create a new access to serve this development from/to the Bramford Road (B1113) south of the existing Bramford Road / junction 52 (A14) roundabout approach access.

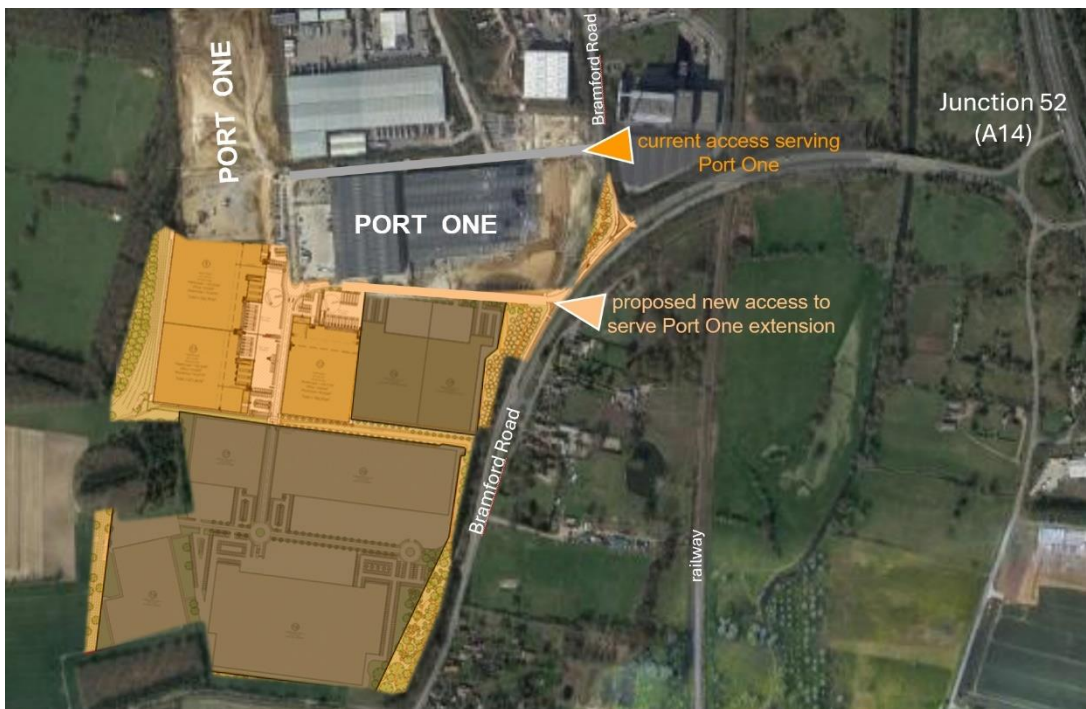


figure 35: **Location of Proposed Access**

4.10.2 This access will take the form of a signal-controlled junction that includes additional lanes to facilitate safe turning movements. The plan extract below shows the proposed junction arrangement.

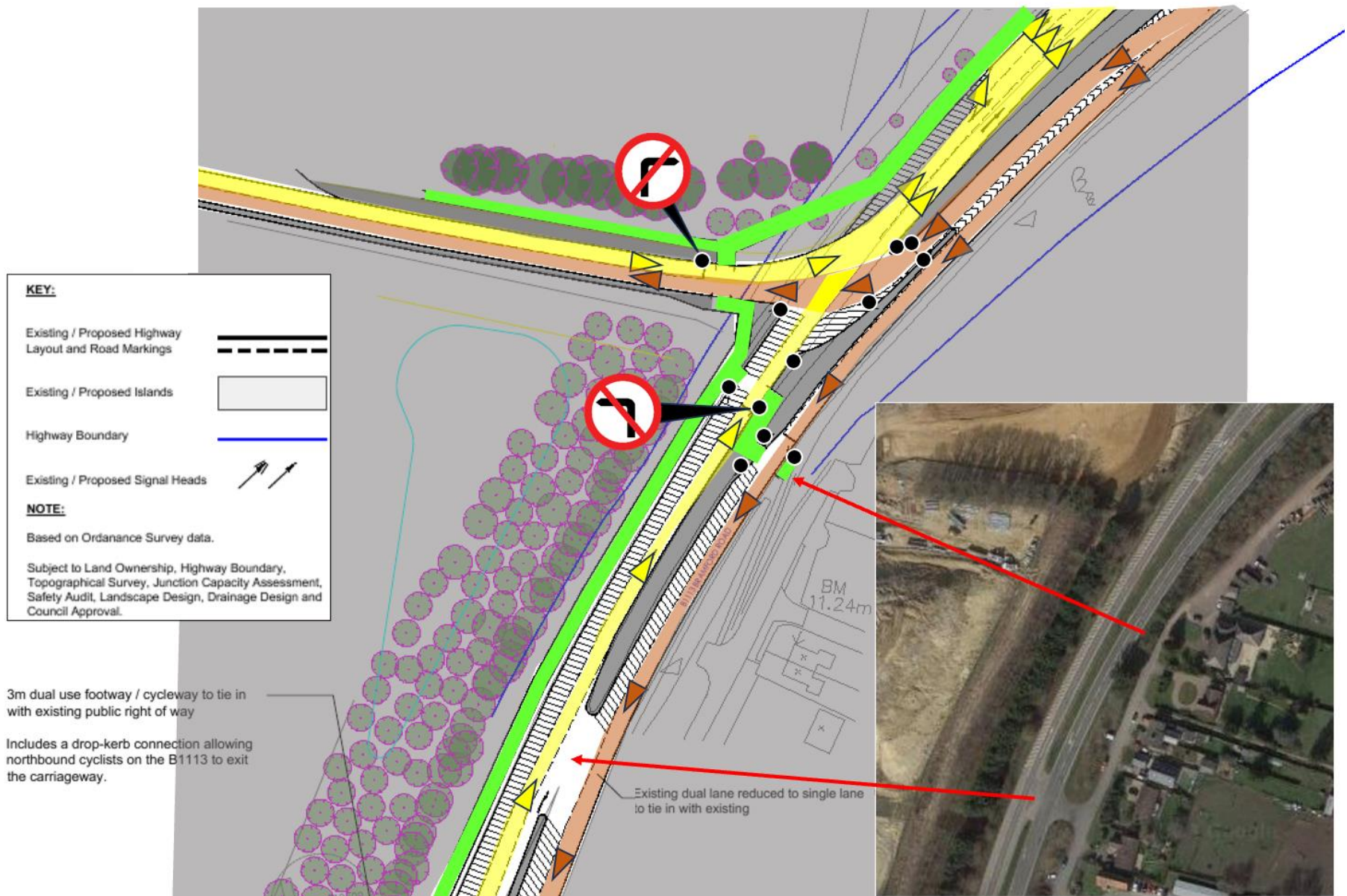


figure 36: Proposed Access Detail



figure 37a: Existing junction

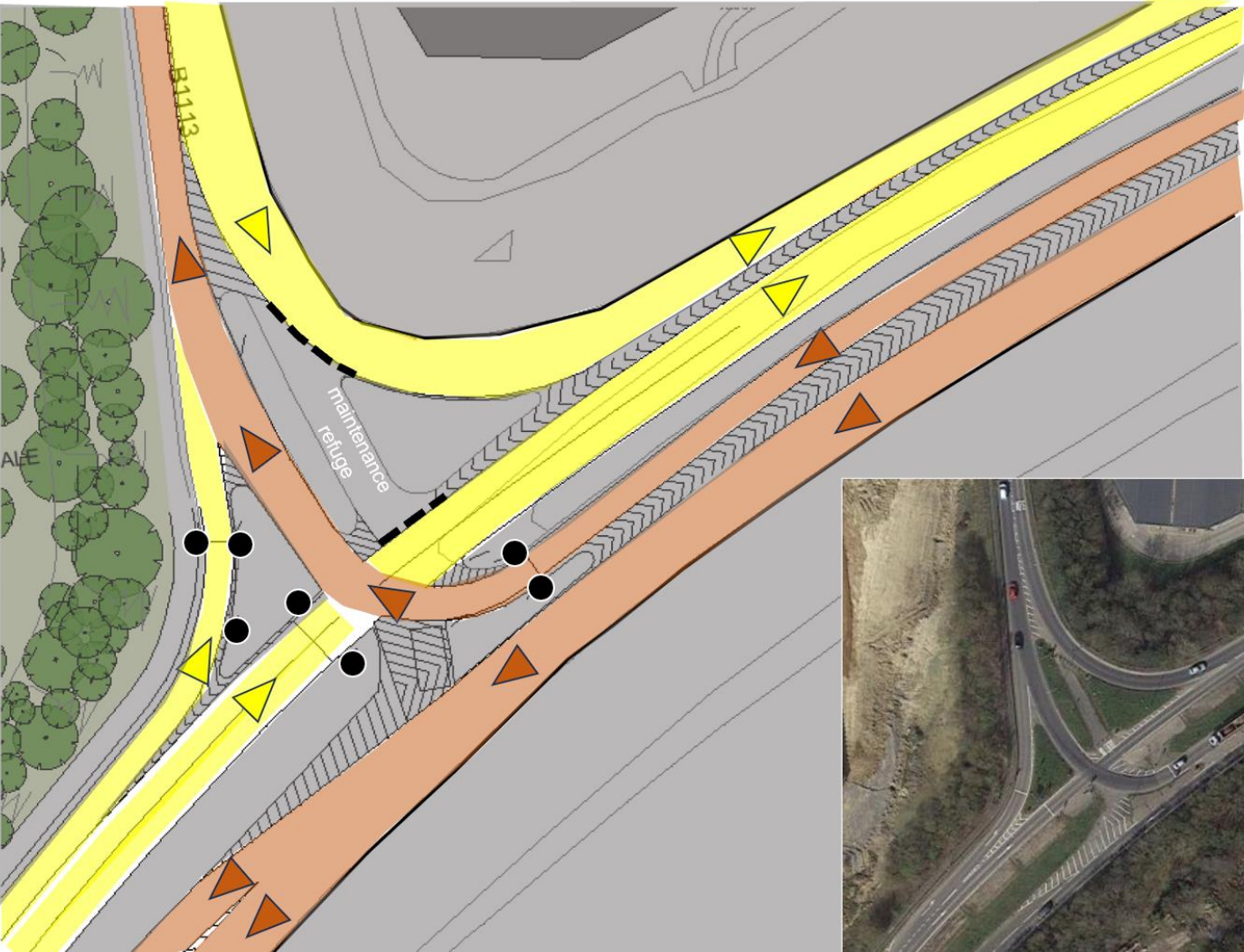


figure 37b: Graphic showing proposed working of modified existing junction

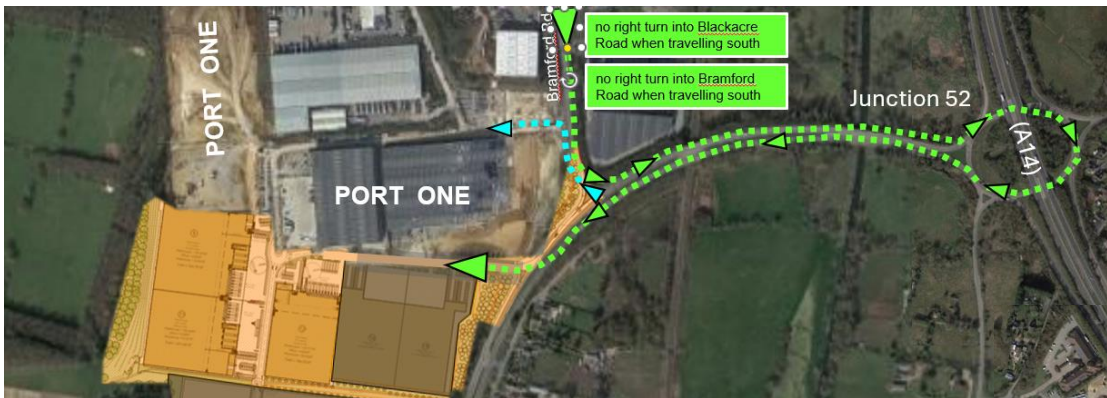


figure 38: **Proposed Traffic Management**

Gt
BLAKENHAM

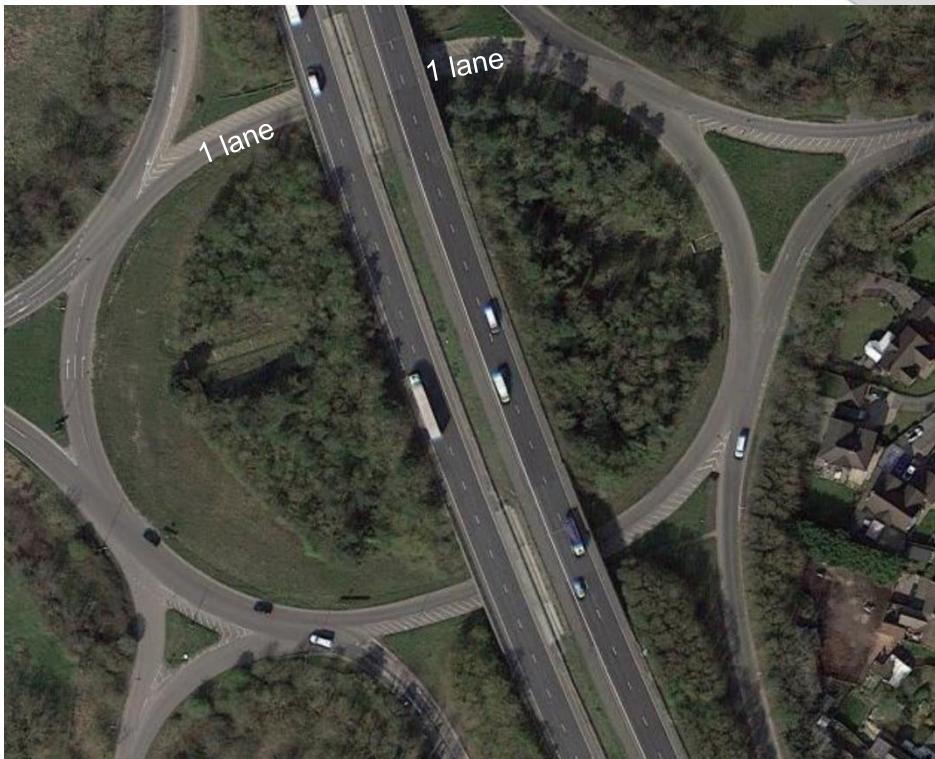


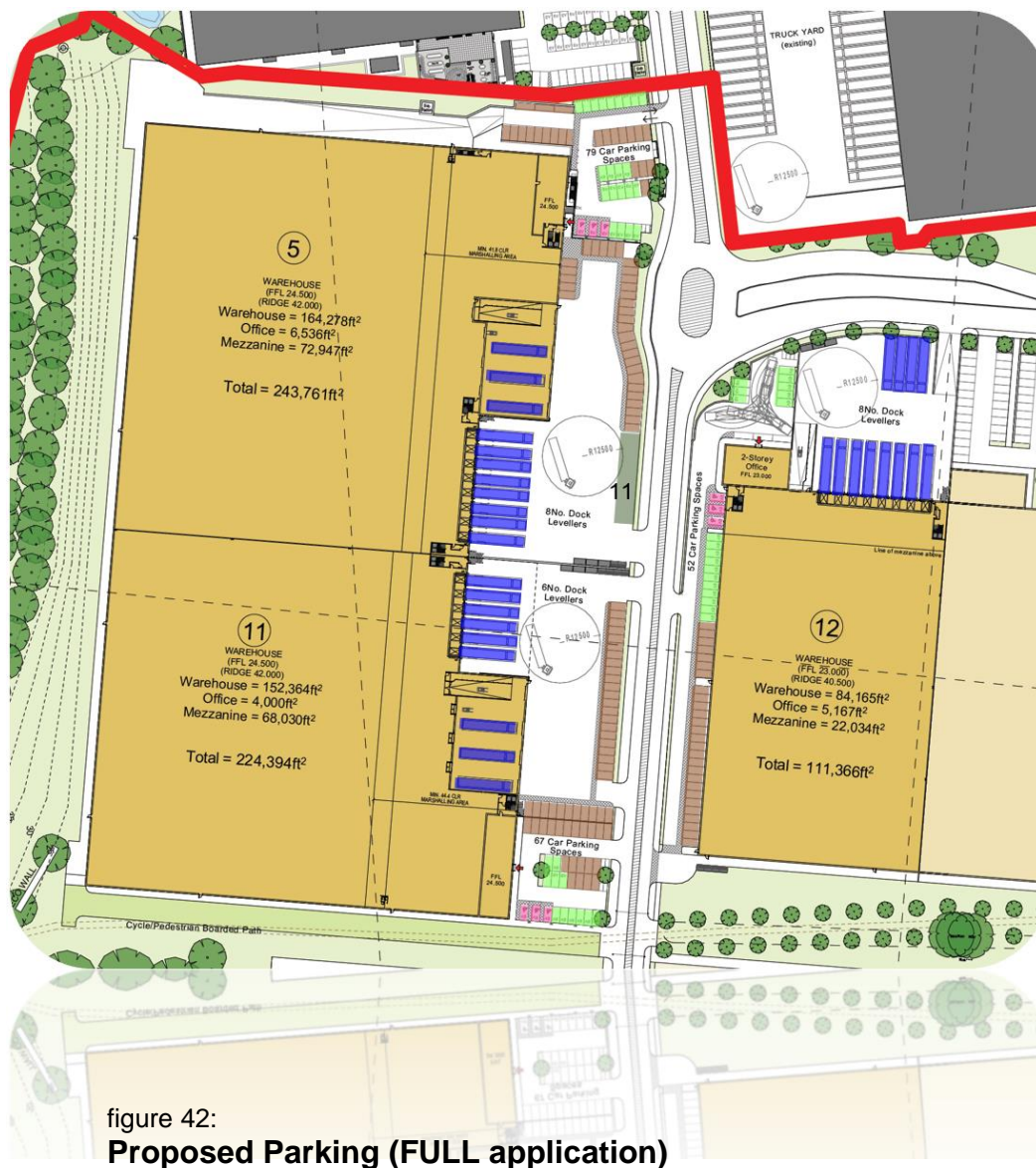
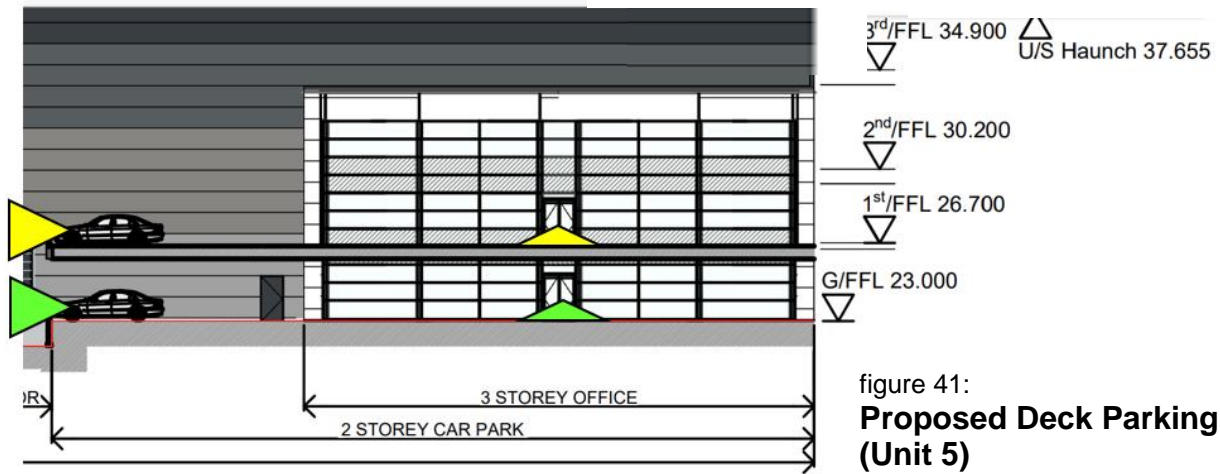
figure 39: **Proposed Improvements to Roundabout – Junction 52 (A14)**

figure 40: **d**

4.11.0 Parking

- 4.11.1 Parking issues are addressed in Section 8 of the Transport Assessment dated November 2022.
- 4.11.2 Car parking requirements were based upon vehicle trip rates that were agreed with Suffolk County Council and National Highways and as were used in the Suffolk County Transport Model to assess the impact of the proposal on the local highway network. It was proposed to provide car parking at around 40% of the SCC maximum parking standards for B8 uses. This reduction from the maximum standard was justified upon the basis of:-
- experience gained from the redevelopment of Units 1-6;
 - the size of the units; and
 - the operational Travel Plan.
- 4.11.3 The application has now been in for nearly a year and, as additional phases have come online, the traffic generation data has been updated and has been shared with County Highways and National Highways in five Technical Notes. Whilst these Technical Notes principally address the capacity of the proposed new junction to the site and the impact on the wider highway network (including Junction 52 of the A14), they all demonstrate a lower trip generation pattern than was originally modelled, which again supports the lower car parking provision.
- 4.11.4 As part of this work, Cottee Engineering circulated a detailed assessment of the impact that the existing shuttle bus is having in terms of reducing trip generation and, therefore, by inference car parking requirements. I have already shared this email with you – another copy is attached.
- 4.11.5 The majority of the nine warehouses completed to-date are still being filled and occupied and are not yet working at full capacity. When they are, we anticipate that there will be 930 employees working over 2-3 shifts. A ‘traditional’ B8 warehouse has only has one shift.
- 4.11.6 If you divide the employees, by the average number of shifts (say 2.5), there will be 372 (average) employees on site at any one time.
- 4.11.7 The applicant advises that the existing 9-seater minibus has 8 passengers and completes 3 journeys per shift, which equates to 60 employees. ($8 \times 3 = 24$, $24 \times 2.5 = 60$)
- 4.11.8 25 employees are expected to arrive by bus.
- 4.11.9 Cyclists equate to 28 (average); Car shares are 30 (average).

- 4.11.10 On this basis Curzon de Vere estimate that on average there are likely to be about 255 cars associated with each shift, once full capacity is reached.
- 4.11.12 Curzon de Vere adds: “This does take into account sickness and holidays, which will reduce the number of employees/car spaces required by a further 10% - say to about 230”.
- 4.11.13 There are 457 parking spaces across the 9 existing warehouses, which is far more than is required, even though that is below the standard county requirement for B8 uses, which, it should be remembered, is a maximum figure not to be exceeded.
- 4.11.14 These figures are described as being consistent with the trip generation surveys that were supplied to both County and National Highways as part of the discussions about car usage and impacts on the local and national highway network.
- 4.11.15 The new warehouses will be occupied by tenants in the same e-commerce sectors and with similar working patterns, so we expect similar employment, trip generation and splits and parking requirements.
- 4.11.16 The new warehouses will, when fully up and running, create a further 1,250 FTE jobs over 2-3 shifts. Parking provision is calculated on the same basis as those for Phase 1.
- 4.11.17 Finally, and at the request of County Highways, the number of parking spaces for Units 5, 11 and 12 was increased (the units for which full planning permission is sought).
- 4.11.18 As with existing unit 2 (Port One, phase 1) the operator has used level differences to cleverly incorporate decked parking into the design in order to expand parking spaces numbers to a level that is acceptable.
- 4.11.19 In summary, the County Council’s parking standards are maxima. Whilst the provision to be made for parking as part of this phase is below the maximum standard, it is fully evidence-based and justified. The primary evidence is the trip generation and car parking requirements of the nine units that have already been completed. Officers have been to site on a number of occasions and have never seen any of the car parks, for any of the units, anywhere near full. And there has been no evidence of on-street parking. (the roads on the estate are private). It is noted that not all of the units are currently operating at full capacity but the parking on-site provision is expected to be adequate if perhaps more fully utilised than at present.
- 4.11.20 Members will have noted that the current application makes provision for the delivery and use of two new additional 15-seater ev shuttle vehicles. On the basis of calculation described above this suggests that capacity will be approximately $28 (14 \text{ passengers} \times 2) \times 3$ (three trips per shift) = 84, 84×2.5 shifts 210 staff. The existing 9-seater will be retained and will continue to carry employees as previously calculated.



Parking provision has therefore been carefully calculated with and agreed by the applicant in discussion with Suffolk County Council as local highway authority and the Council as local planning authority. Curzon de Vere has co-operated throughout and has responded positively and constructively to both Council's on the issue of parking provision.

4.12.0 Appearance (design), Layout and Scale

4.12.1 Full Application

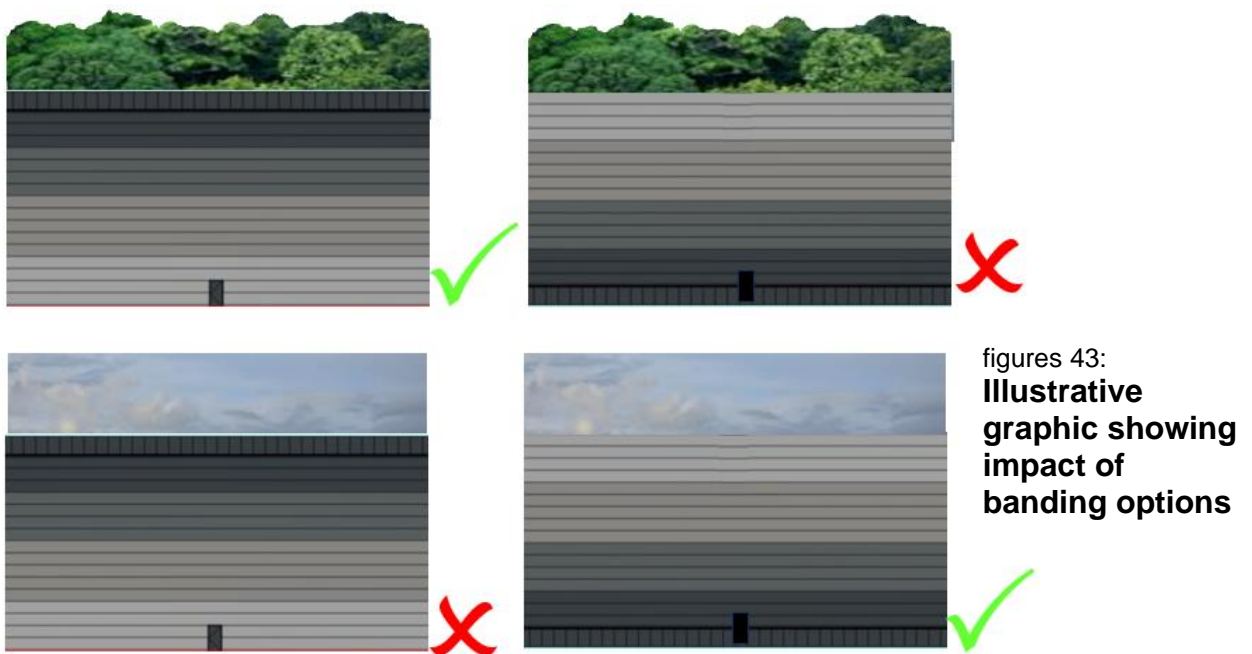
4.12.2 The proposed designs for units 5, 11 and 12 closely follow the now established house-style approved previously and as such will reinforce the consistent logistics 'campus' character and branding.

4.12.3 The mass of these large buildings is disguised by coloured banding that runs horizontally up the elevations in sequential shades of grey.

4.12.4 The gradation of the bands used at Port One has been the subject of significant debate at previous Committee meetings as the selected pattern appears at first sight to be counter to normal expectation.

4.12.5 Members have agreed that running the bands from light to dark up the building is appropriate because the buildings are seen against and below a backdrop of trees on the Blakenham Estate plantation (which is on significantly higher ground) . It is therefore important to have the darker shades at the top to disguise the buildings in key long views across the Gipping valley from the east. Having the reverse gradation would not work to disguise the mass of the buildings in this particular case as they are not seen against the sky in the key views.

4.12.6 To illustrate the principle, officers have provided the schematic below.



4.12.7 Outline Application

4.12.8 This does of course mean that in near views the relationship changes but the extensive landscaping being proposed and the retained trees and hedgerow will quickly soften and disguise the mass. In the examples below unit One at Port One (*completed and occupied as part of phase 1 development*) can be seen in near views (*note the new planting that will quickly provide a new green foreground*) and unit 7 is seen as an internalised view at the end of a long densely landscaped marginal buffer. (*that occupies the north side of Blackacre Road - The other side is frontage by buildings*)



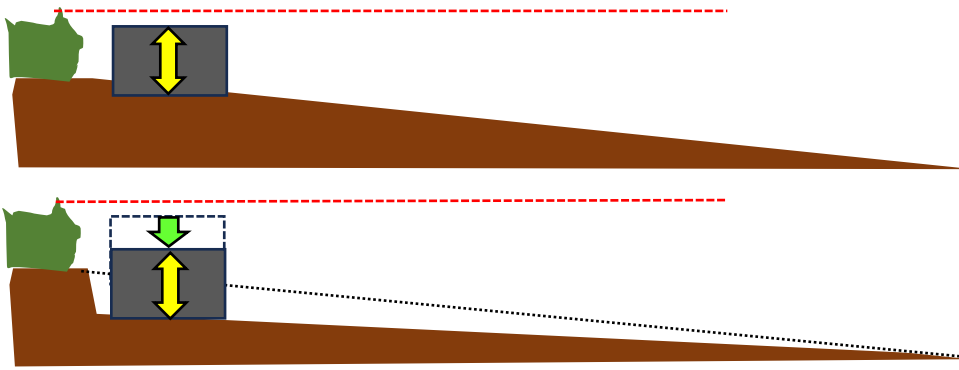
figures 44:
**Phase 1: examples
of new planting**

4.12.9 When all is said and done, Port One is what it is and there's no getting away from that.

4.12.10 It's a large logistics park which by its very nature comprises a series of large state of the art buildings providing 'functional' warehouse/distribution accommodation to service the UK's import/export business. It is however surprisingly well-contained physically (rather than sprawling), generally away from existing residential development and the size and impact of the units within phase 1 has to a considerable degree been softened by

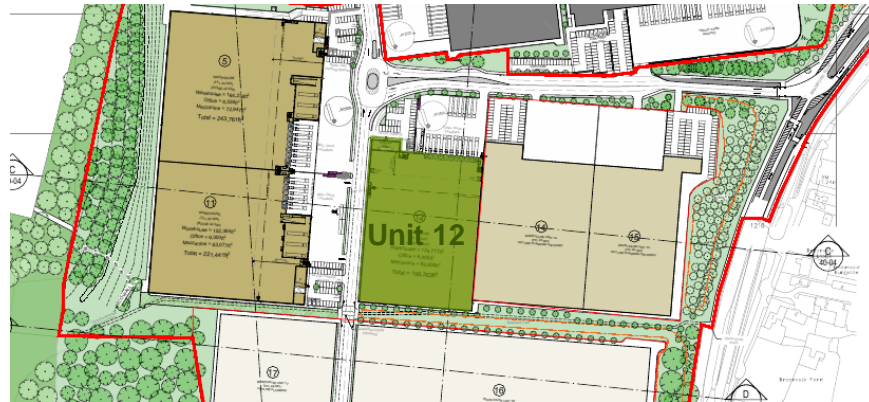
extensive regrading of what were the previously existing ground levels. (the site slopes up from the Bramford Road but by reducing the incline (through excavation) the new finished floor levels of many of the units are now significantly lower than the previous ground level which has effectively reduced the position of the ridges when viewed against the backdrop of the Blakenham Estate Plantation. The level of which has remained unaltered.

4.12.11 The schematic below illustrates the principle

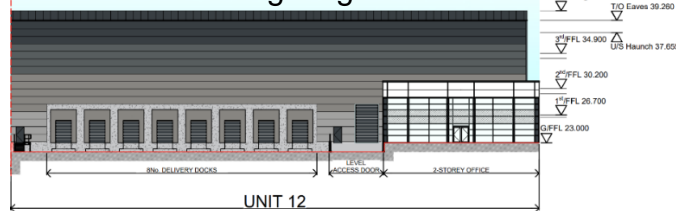


figures 45:
Illustrative graphic showing impact of level changes relative to the Blakenham Estate Plantation

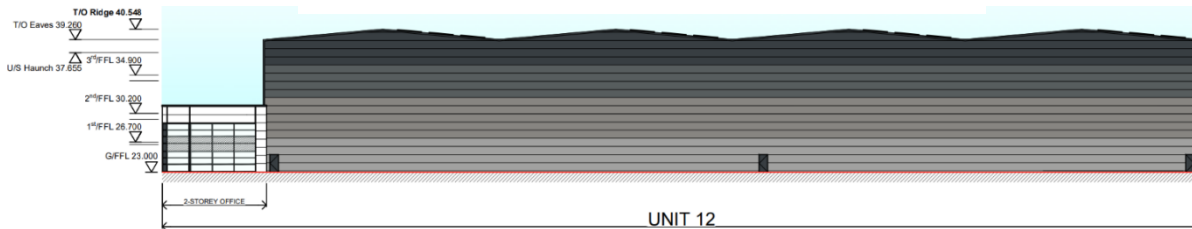
not to scale: purely illustrative

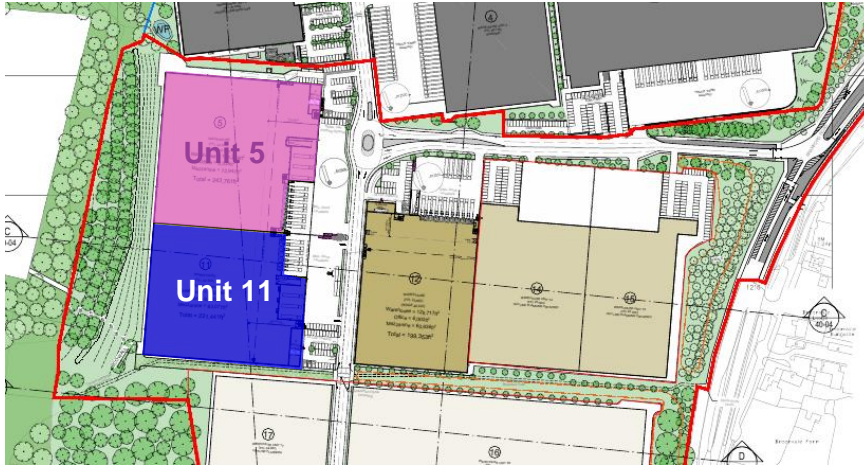


overall building height 17.54m

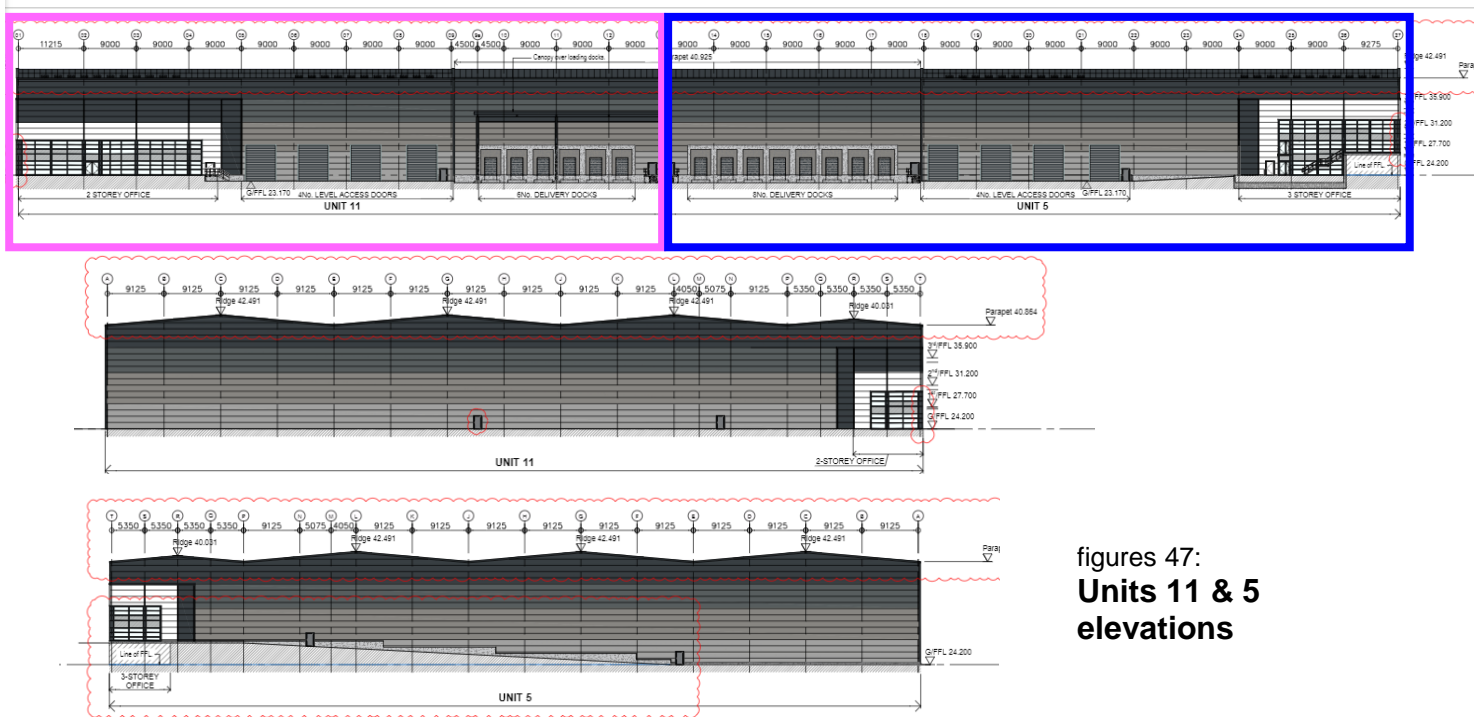


figures 46:
Unit 12 elevations





overall building heights 18.29m



figures 47:
Units 11 & 5
elevations

- 4.12.12 Will it produce a monoculture of building types and activity? - Yes, it will - but in the view of officers the applicants have already produced a high-quality development that stands repeating and the current proposal is set to expand at the same quality, that is if Members are minded to grant permission for the application before them here.
- 4.12.13 That quality can be measured not just in design/layout and landscaping terms but also in the wider sense of the economy, wellbeing, job opportunities, community benefits, ecological/biodiversity enhancements and a real step forward in sustainable commercial development. These will be discussed later in this report.

- 4.12.14 The District only has one purpose-built logistics park and that is Port One. Certainly Gateway 14 does and will include warehouse and distribution units but it is expected to provide a wider range of business opportunities that embraces office, industry and research and development. Indeed the planned Innovation Centre within Gateway 14 is expected to take expansion there into the 'new technology' direction.
- 4.12.15 Whilst elevations for units 14, 15, 16, 17, 18 & 19 (*no unit 13 - perhaps a business nod to superstition*) are not before Members (*as they are within the outline element of this hybrid application*), if Members are minded to grant outline planning for this component, then such detail would be one of the normal Reserved Matters. The developer/operator would be expected to follow and respect the established character appearance and quality.

4.13.0 Sustainability

- 4.13.1 "Surely", many may question, "Can it be right for the Council to be supporting the movement of goods by HGV's from an environmental perspective?"
- 4.13.2 Well let's look at that question in its planning context....
- 4.13.3 Certainly, even with improved fuel efficiency and technology, long distance haulage using fossil fuelled hgv's continues to contribute towards :
- (i) the carbon footprint of the logistics industry; and
 - (ii) the associated pollution from fumes and particulates.
- 4.13.4 Decarbonisation for HGV's in the medium term will mean a "*shift from fossil fuel powered vehicles to low carbon alternatives such as electric and hydrogen and in the interim technologies such as lower carbon fuels including compressed natural gas (CNG) and biogas.*"¹⁰
- 4.13.5 It appears that until Government regulation to phase out fossil fuel vehicles actually comes into force, a significant amount of freight will continue to be moved by road using HGV's.
- 4.13.6 Mid Suffolk through an accident of geography happens to be a gateway to and from the Port of Felixstowe, the UK's busiest container port.
- 4.13.7 That being the case, it means that the majority of imports and exports through Felixstowe will of necessity almost certainly continue to travel along the A14 through Mid Suffolk. We are almost the first and last 'port of call' for any lorry journey from and to the Port to anywhere in the UK . (save for other suitable East Suffolk or Ipswich locations – Members will no doubt be aware that the Orwell Lorry Park closed some

¹⁰ British Retail Consortium Climate Action Roadmap.

time ago to facilitate redevelopment and that Phase 1 of the planned 60 acre Orwell Logistic Park has opened in Felixstowe)

- 4.13.8 The lorries with their fossil fuel engines will therefore keep coming and they will continue to travel through the District from all points of the UK compass whether or not Port One is expanded. Like it or not the A14 is a conduit for HGV traffic.
- 4.13.9 Just 'passing through' does little to boost the local economy whilst it continues to impact our environment. Attracting businesses that use this passing traffic as their life blood offers an alternative to significantly boosting the local economy. Indeed perhaps it can be taken further to pioneer a new approach to greener commercial haulage in the medium term.
- 4.13.10 In response to the need to decarbonise the operators of Port One are already exploring plans to provide alternative fuel filling facilities (electricity and hydrogen) in the future – but first we need efficient electric and/or hydrogen powered hgv's. That seems still to be some way off.
- 4.13.11 With such a strategically located and sizeable logistics park as Port One, the operators potentially have a business advantage/motive for setting up such an operation - although that is not presently on the table within the current application.
- 4.13.12 It is therefore a prospect for '*jam tomorrow*' but all-across the UK the logistics industry (like everyone else) is having to face adapting to the transition away from fossil-based fuels.
- 4.13.13 Until then then the Country will continue to rely on massive quantities of goods be transported all around the UK in hgv's, powered by fossil fuel engines.
- 4.13.14 Port One has already brought new jobs into the District and expansion, if approved, will create many more such opportunities from which hopefully more local people will benefit.
- 4.13.15 It is worth noting that the operators of Port One have an employment consultant on site to promote new job opportunities and she already circulates job opportunities directly to local Parish Councils if they are interested as a way of keeping local communities informed of forthcoming job opportunities.
- 4.13.16 Curzon de Vere has also indicated that it is willing to work with MSDC, the Job Centre, Suffolk One and schools to promote training & skills opportunities, particularly for school leavers and long term unemployed to enhance their job prospects.
- 4.13.17 This offer of support can, if Members are minded to approve the application, be formalised and worked up via S106 and it is expected that the Council's Economic Development Team would also be involved in any such initiative.

4.13.18 Electric Staff shuttle vehicles

4.13.19 The applicant intends to provide a further two electric mini-buses to serve the development and provide free staff transport . If approved Curzon de Vere will acquire two, 15-seater electric vehicles to complement the 8-seater they already operate. Thos will increase capacity to 38 seats at any one time. The provision of the additional electric vehicles will be secured by S106 Agreement, although the operator is keen to deliver them in any event as there is a strong business case to be made for them, it fits the ethos of Curzon de Vere, it helps recruitment and the running costs are included in the service charge to occupiers.

4.13.20 Consultants for the applicant have provided the statement below in response to an officer request for information about the real-life impact and effectiveness of the existing ev shuttle vehicle that has been provided and the likely impact of the additional vehicles now proposed.

“ .. We believe that the analysis should reflect the actual operation characteristics of the site now that some units are up and running in terms of traffic generation and distribution. We consider that the evidence presented coupled with commitments to reduce single car occupancy is a robust and appropriate approach. As mentioned in the latest information (TN04), the Port One electric minibus is operational and has been very successful to date in reducing car movements associated with staff.

Recently a further 7 units at Port One have been occupied (currently in the set-up phase and not operating in a ‘normal’ manner whilst the warehouses are being filled and organised) and the minibus is shortly expected to be operating 12 journeys per day (6 transferring to the site and 6 transferring away from site). The minibus mainly serves the IP1 and IP2 areas where the largest proportion of staff live and has had very positive feedback and uptake. I attach a photograph from yesterday afternoon (23.08.23) which demonstrates the usage for staff leaving the site.

Running at capacity, the minibus can shortly lead to a reduction in 96 staff car movements to and from the IP1 and IP2 areas per day. This service is a permanent requirement for Port One secured via S106 and is an ongoing commitment to provide sustainable travel options for staff. The latest information (TN04) confirms that a further two 15-seater (14-passengers) electric minibuses will be provided as part of the extension proposals and this will be secured through the S106 and Travel Plan. When the additional two 15-seater minibuses are operating 12 journeys per day this offers the potential to reduce staff car movements by 336 over each working day. In total, the three minibuses will be able to reduce car movements to and from Port One by 432 per day and provide 216 staff with a sustainable (and free) method of travel to work...” Andrew Firmin BSc (Hons) MCIHT, Cottee Transport Planning 24 August 2023

4.13.21 Certainly this suggests that the experiment encouraged by the Council has and is working and that it could set the benchmark for greener staff and environment friendly travel to work within large commercial developments within the District. It is

acknowledged that Curzon de Vere has exhibited a real willingness to embrace this innovation in the first instance as is their enthusiasm for expanding it.

4.13.22 Community access to electric shuttle vehicles

4.13.23 As part of their commitment to supporting the local communities in the area Curzon de Vere has offered to make the fleet of electric shuttle vehicles accessible to such communities for pre-agreed trips to services and facilities. The system would be operated by Port One and would be delivered free of charge to users (and funded out of the Port One service charge to occupiers). This service would be available out of peak staff transport times.

4.13.24 Port One and the Council have been in discussion with the Integrated Care Board (ICB) about how the offer could be utilised to provide access for patients to and from the Needham Market GP practice that serves the five parishes area. The ICB suggested that discussion should be opened directly with the Practice Manager at the Needham Surgery to work out whether a patient shuttle service could be operated effectively to dovetail with appointments. At the time of writing this report it had not been possible to secure an appointment to discuss the principle with the Practice.

4.13.25 Even if it turns out that the Practice does not wish to collaborate in such a scheme, other possibilities exist. For example it might be useful to set up pre-arranged trips for hospital appointments at Ipswich General, or trips to Ipswich or Stowmarket. Curzon de Vere is willing to engage in dialogue with local parish councils and relevant destination operators to deliver a reliable working scheme that improves accessibility to key services/facilities for the rural communities in the area that do not have access to a car or would prefer a greener method of travel but cannot afford an electric vehicle of their own.

4.13.26 If Members are minded to approve the development and welcome the initiative described above then it is recommended that suitable clauses be included in any Section 106 Agreement required to make the development acceptable. These clauses should include agreeing further detail around the method of operation, destination selection, routing, reliability of service, frequency, booking method and more and the service should be offered free to users. The agreed system should be regularly reviewed and arrangements altered or amended where necessary to ensure optimum usage and effectiveness and should continue until and unless the Council formally agrees to its cessation after discussion with the five parishes or for the cessation of business at Port One, whichever is the earlier.

4.13.27 PV

4.13.28 Port One is something of an exemplar when it comes to the use of pv energy. Asked to describe their approach Curzon de Vere state:

“Port One is looking to provide roof mounted Photo Voltaic Cells that will generate 100% of the power requirements (lighting, security, IT, heating/air conditioning for office units, charging of fork lifts and EVs etc) of a standard B8 ambient warehouse. The number of PVs required to achieve this has been derived from half hourly data from two existing warehouses that have been operational for over a year. Consultants have designed a system to allow a net zero position by adding substantially more PV generation than required under existing Breeam Excellent criteria. Each occupier will be connected to the grid, but has the opportunity to export in the high generation months and import back in the darker winter months, to average a net zero position over the year.

There may be exceptions to this, where a tenant has unusual power needs. The only one to date is Lay & Wheeler (Unit 6), which has to keep the temperature within its warehouse at a constant 13 degrees (to preserve the wine). Its power needs are approx. 10 times that of a standard warehouse and, although its roof is covered in PVs, they are still insufficient to generate 100% of its needs.”

4.13.29 The buildings are designed such as to be able to take the additional loading of expanded pv coverage and so tenants can work with Curzon de Vere to increase pv. coverage beyond that calculated to meet the 100% need of the average consumption.

4.13.30 Members will also have noted that the applicant has agreed to provide pv panels on a number of local village halls free of charge as part of its commitment to mitigating the impact of the construction process on local communities. In this way the running costs of such local facilities can be reduced and each can make a contribution towards helping to tackle the climate emergency. Parish Councils have welcomed this offer of collaboration. For the reasons discussed earlier, it is recommended that these elements be offered in the form of a Unilateral Undertaking signed by the applicant.

4.13.31 BREEAM

4.13.32 All units will be designed and constructed to achieve a BREEAM level of at least ‘very good’.

4.13.32 Future grid capacity

4.13.33 Curzon de Vere has indicated that it has aspirations to go further in the future and whilst ‘what might be’ cannot be taken into account when considering the ‘here and now’ of the application before Members it is interest to note the scale of the company’s ambition. They appear to be looking to be pioneers in ‘green’ innovation in business development when they state:

“Further to Port One’s net zero offering, it has been in detailed discussions with numerous energy providers to try and secure renewable network power in order to facilitate the future use and charging of electric HGV’s. They have a very significant power requirement, which, due to the inadequacies of the existing power distribution network, is currently potentially only available in a limited number of locations in the UK. Port One is in detailed discussion with two providers to take 115 Mw of renewable supply, via the Bramford Sub-Station, from 2025, in order to facilitate overnight electric HGV charging. The intention is that a fleet of electric HGVs will be used for the short hop from the port of Felixstowe to Port One. If this can be achieved, it will be a first in Europe. When fully operational, it will see diesel trucks on the A14 being replaced by clean renewable electric vehicles taking 10’s of millions miles of diesel use off Suffolk’s roads.”

4.14.0 Business Investment within the District

- 4.14.1 Curzon de Vere has stated that investment to date in delivering the ‘as-built’ elements of Phase 1 of Port One has been to the tune of £178.5m with an additional £34m in fit out costs.
- 4.14.2 They estimate that if the current application is successful then a further £367m will be invested in Port One along with a further £48m in fit out costs.
- 4.14.3 In total, £627,500,000 (nearly £²/₃ billion.) represents a huge financial investment within the District and is a significant expression of business confidence in what the District has to offer. (whilst much of this may be as an accident of geography the fact that the Council has previously supported the development of Port One through the plan process also contributes to Curzon de Vere’s willing to continue doing business here and to set a new benchmark for sustainability)

4.15.0 Balanced growth

- 4.15.1 Whilst the type of jobs being created at Port One are a very particular type and whilst they may not generate higher paid high tech or research and development opportunities, they do provide a valuable source of local employment.
- 4.15.2 Members will appreciate just how rapidly parts of the District have expanded in terms of largescale residential development but without commensurate increases in local job opportunities it is difficult for any planning authority to argue that it is creating balanced growth. Mid Suffolk has been fortunate or forward thinking (or both) in ensuring that it is able to support the growth of employment. Some of this is has actively delivered itself through its timely intervention and investment in the market – such as Gateway 14. Elsewhere such as Port One it has supported it through the planning process and its planning policies.

- 4.15.3 It should be acknowledged to that to some degree the Council has actively shaped job creation and has not left it to the vagaries of the market - where residential development always seems to outpace the ability the commercial sector to keep up.
- 4.15.4 Whilst development along the A14 brings with its own issues it has meant that the District has capitalised on import/export business opportunities that arose from Brexit. *(irrespective of individuals views on the pros and cons of Brexit and the relative long-term merits or not of the Freeport system).*
- 4.15.5 To that extent it feels anecdotally as if Mid Suffolk has been able to buck the trend of employment stagnation or decline that emerged as a result of the impact of the Covid 19 crisis that followed hard on the heels of Brexit and that has dogged so many other areas in the UK.

4.16.0 Jobs

- 4.16.1 The applicant calculates that once the units within phase 1 are operating at expected capacity there will be some 930 employees working over 2-3 shifts. They point out that a 'traditional' B8 warehouse generally operates only one shift. Some of the units within Phase 1 already operate 'extended' hours (early starts and later closing in the late evening) although none currently work 'round the clock'. The relevant planning permissions do not restrict working hours and it is expected that some will have 24 hour working as part of their business model as next day delivery is rapidly becoming a customer expectation. Indeed the ability to operate 24/7 in the logistics industry allows goods to travel overnight when roads are not congested thereby improving delivery times as well as helping to smooth out hgv movements on the trunk road system to the benefit of other road users and general capacity.
- 4.16.2 The applicant estimates that the new warehouses will, when fully up and running, create a further 1,250 FTE jobs over 2-3 shifts.
- 4.16.3 This would, if all the jobs materialised come to just over 2000 jobs. This would represent a significant boost to the local economy, create opportunities to improve job prospects for many across the District and offer a chance to improve the quality of lives/wellbeing for others.
- 4.16.4 Even if one takes a very conservative view of job generation (ie one shift operation across the board) the resultant number of new jobs is still significant. $(2180 \div 3 = 726)$.
- 4.16.5 Port One, if extended as a result of the current application being successful and estimated jobs being delivered, has the ability to become a major local employer in the District.
- 4.16.6 These figures do not include any service jobs that are likely to arise to support the operation at Port One. As Members may be aware from previous applications, Port One operates a fleet of solely electric powered fork lifts, something that is still unusual in

industry where such equipment tends to be bottled gas powered. This fleet will be significantly expanded if the current application is successful.

4.16.7 Currently Curzon de Vere is currently exploring the prospect of setting up a local maintenance centre with the national service company¹¹ such is the size of the expected fleet. Once again this is something where Port One is helping to put the District 'on the map' when it comes to showing the way for sustainable commercial development.

4.16.8 Closure of Magnus (Addison Way)

4.16.9 It appears from information provided by Port One that an operator intending to take one of the units in Phase 2 has come to the rescue of some 38 employees of the former Magnus group who were made redundant in November 2023. Hemisphere Freight Services, which Curzon de Vere advise is committed to Unit 5, has apparently agreed to take them on in its new Port One facility. If true then this would indeed be good news for those involved. Clearly the loss of jobs in the District is bad news and the loss of Magnus will mean that some former employees are now sadly without a job. In this context a development offering to create hundreds of new jobs is something that has the potential to boost economic resilience.



figures 48: **The Magnus Building – Addison Way**



figures 49:
Hemisphere Freight vehicles

¹¹ Milton Keynes based

4.17.0 Business rates

- 4.17.1 Whilst in and of themselves business rate receipts may not be a material planning consideration, they do represent income that can be reinvested by the Council in services and thereby directly or indirectly back into the community, the local economy, infrastructure and/or facilities. It is an economic benefit arising from business development.
- 4.17.2 The applicant company has been asked to describe the level of rates they calculate as being payable. Their answer is as follows:

“Rates income on the existing units at Port One is £2.577m per annum¹². If the units that are subject of the hybrid application are completed by 2025, then the income increases to £7.755m per annum¹³.”

4.18.0 Trees, Landscape, Ecology and Biodiversity

- 4.18.1 The proposal does involve the loss of some trees on site, including a small number within category A. (please see figures 50-52) .
- 4.18.2 The majority of the tree loss relates to a strip of land behind the ‘to be retained’ mature trees that line the site’s Bramford Road frontage. Much of this flora has already been removed during Phase 1 works.
- 4.18.3 Whilst this may at first sight seem somewhat brutal the flora hereabouts was cleared to accommodate a string of drainage basins along the eastern edge of the site behind what is shown as the site’s retained tree line. Both the LLFA and the Council’s Landscape Consultant are excited at the prospect of creating a new wetland habitat [‘a wet wood’] in this location as this will enhance biodiversity and allow for the creation of an innovative SuDS solution.

“Wet wood is a great idea, especially as it’s been proposed along the western edge where there were significant tree losses.” Place Services Landscape

- 4.18.4 The full detail has yet to be agreed but as this site lies within the outline application area these can be developed. Whilst the outline application describes landscape as not being a Reserved Matter the Council can if so minded condition the need for further details on those parts of the site where it feels insufficient detail has been provided. Similarly beyond the proposed basins are pockets of land that appear to be grassed but these too might benefit from additional tree planting. (please see figure 52)

¹² This figure has not been checked with the Business Rates Team.

¹³ The Council receives 50% of the total receipts with the remainder going to the Government. On that basis, if Accurate, £7.755m pa represents £3.877m to MSDC pa or £10,623 per day (£74,363 per week) to MSDC

- 4.18.5 Members will also have noted the understandable reticence of the Council's Arboricultural Officer to see the loss of a small group of Category A trees within the central part of the site. Officers did explore the possibility of saving these by replanning the layout. Unfortunately access to the site relies on the recently completed estate road serving Phase 1 (Blackacre Road) being extended. The trees in question sat on that route and the extensive regrading of levels associated with the construction of Phase 1 have already changed the landscape hereabouts.
- 4.18.6 Consequently the advice provided by the Arboricultural Officer to secure extensive replacement planting offers the best alternative. It is recommended that the provision of a good number of extra heavy standard trees elsewhere on the site be secured by a condition. This planting of large new trees should ideally be targeted around the edges of the site where public views can be enjoyed rather than in the centre of the site where views are by their nature internalised.
- 4.18.7 The need for the submission of full tree protection measures for retained and hedgerows should also be **conditioned** as recommended by the Arboricultural officer.

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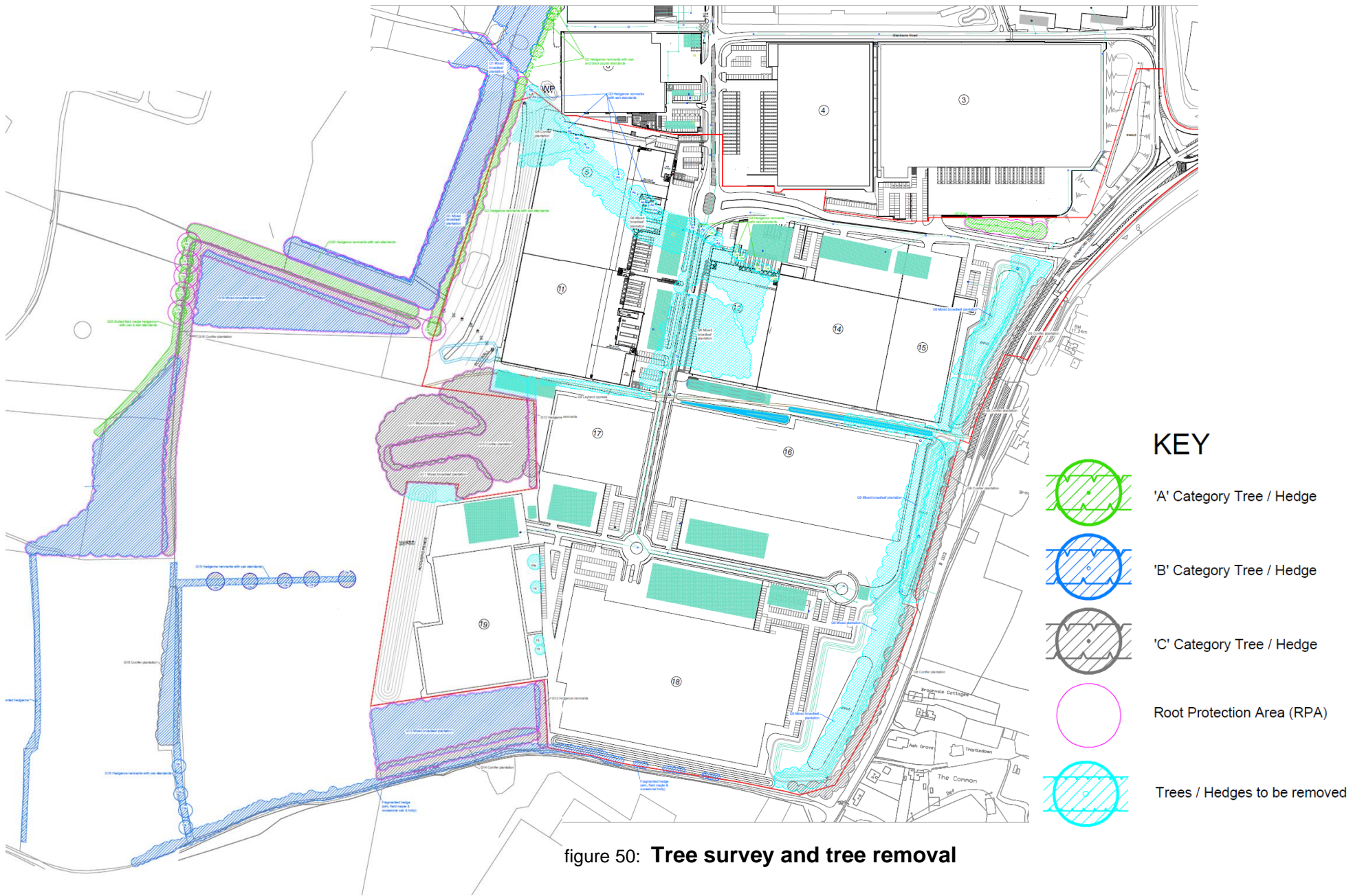


figure 50: Tree survey and tree removal



figure 51: **Schematic: Retained and lost trees** (green shading = retained white dotted outline – lost)

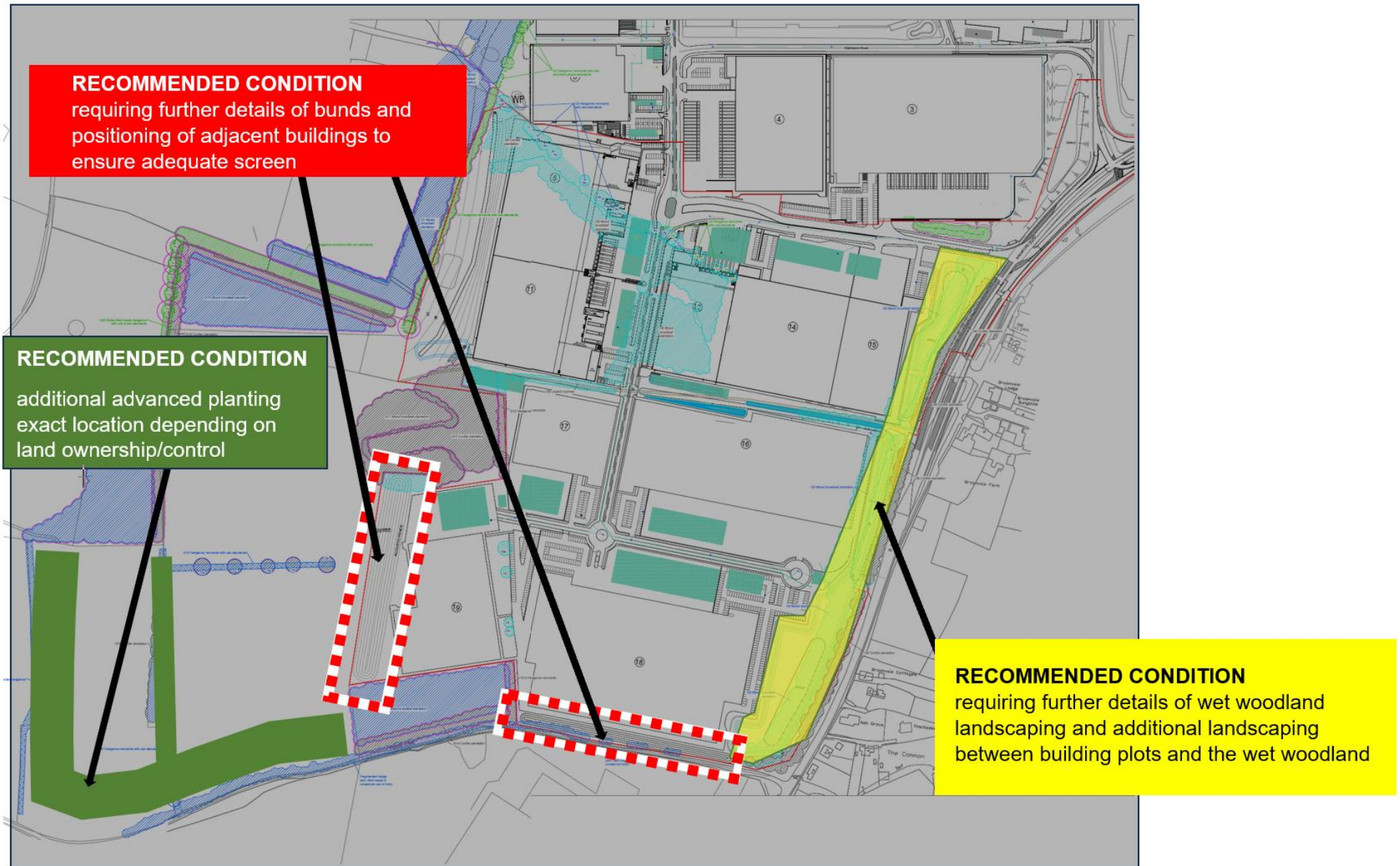


figure 52: **Schematic: Suggested conditions**

4.18.8 The comments made by Place Services Landscape in respect of bund detail on the southern and western edges of the site are shared and it is suggested that if Members are minded to grant planning permission a **condition** be added requiring further detail of the bund cross sections and planting to be submitted to and approved by the Council as local planning authority. This may necessitate adjustment to the outline application plots/buildings.

4.18.9 It is also considered prudent to require further and full details (by **condition**) of the new green corridor feature and any retaining structures.

4.18.10 Members will have noted that the Council's Ecology consultants (Place Services Ecology) have stated

"No objection subject to securing ecological mitigation and enhancement measures"

4.18.11 The **conditions** recommended by Place Services Ecology are considered appropriate. Namely;

- Construction Environmental Management Plan (CEMP) for Biodiversity
- Biodiversity Net Gain Plan (BNGP)
- Wildlife sensitive lighting
- Biodiversity Enhancement Strategy (BDS)

4.19.0 Gipping Meadow Land

4.19.1 This 8.8 ha site is an increasingly rare pocket of floodplain meadow. It is therefore a valuable habitat.

4.19.2 As the name suggests it is prone to regular flooding (in this case by the River Gipping) and has not been subject to intensive arable agricultural but occasional grazing. This means that the ecosystem and the habitat it provides is special because of its growing rarity.

"After woodland clearance, meadows were one of the main land-uses of almost all river floodplains in England. However, it is estimated that 98% of UK flower-rich meadows have been lost over the last century due to land drainage, changes in agriculture and urban development.

Unimproved, species rich, seasonally-flooded grasslands are one of the rarest forms of flower-rich meadows. They have sustained unquantifiable losses through the application of fertilisers to increase yields of hay, the increase in nutrient loadings carried in rivers, and through re-seeding and ploughing following a change from hay production to silage. There are now less than 500 ha each left in the UK of MG5 Old grazed hay meadow and MG8 Water meadows. (Jefferson and Robertson, EN 1996).

Species-rich floodplain grasslands are categorised differently from Coastal and Floodplain Grazing Marshes because there are generally no drainage ditches. The high conservation value of these lowland meadows stems from their species richness, their ancient semi-naturalness and the presence of rare plants such as marsh cinquefoil and orchids. Many species rich grasslands in floodplains also function as seasonal washlands, allowing un-embanked streams and rivers to temporarily store flood water in adjacent meadows during periods of high flood flow.” Sussex (sic) Wildlife Trust.¹⁴

- 4.19.3 The offer of this 8.8ha site as a nature/biodiversity enhancement area is supported by the Council’s Public Realm Team generally and its ecologists and Biodiversity project Manager specifically and its Communities, and Development Management Teams as well as by both Barham and Great Blakenham Parish Councils. The offer includes an option for the Council to acquire the freehold of the land from the applicant at any time for £1.
- 4.19.4 This would be secured by way of clauses in any Section 106 Agreement if members are minded to grant planning permission).
- 4.19.5 If the land remains in the ownership of Curzon de Vere they will manage it to a specification and with facilities and improvements that have first been agreed by Mid Suffolk District Council in a management plan that will also prescribe the management regime. Such a plan shall be reviewed regularly by the Council and amended as and when necessary. The cost of setting up the site as required by the Council and then for its ongoing maintenance will be funded by Curzon de Vere (or their successors) in perpetuity (for the life-time of Port One) through its service charge to occupiers.
- 4.19.6 In the event that Mid Suffolk District Council or its nominee/s opts to trigger the land transfer for £1 then the operator will also provide an agreed annual maintenance sum to the Council of its nominee/s for the purpose of ongoing maintenance, interpretation, improvement or other related purpose. The quantum of that sum has yet to be agreed and would inevitably relate to the expected/actual maintenance costs of managing the site in perpetuity. With the agreement of the Council the operator can seek to make defined multi-year phased lump sum payments (rather than annual payments or even a one-off life-time payment. The Council will have the ability to reject such payment options if it chooses in favour of annual receipts. All payments will be indexed linked.
- 4.19.7 The 2023 ‘State of Nature’¹⁵ Report highlights that:
- One in six species is now at risk of being lost from Great Britain
 - The wildlife studied has, on average, declined by 19% since monitoring began in 1970
 - The majority of important habitats are in poor condition, though restoration projects have clear benefits for nature, people and adapting to climate change

¹⁴ <https://sussexwildlifetrust.org.uk/discover/around-sussex/wetland-habitats/floodplain-grasslands>

¹⁵ Produced by 46 local Wildlife Trusts that included Suffolk Wildlife Trust



figure 53: **The Gipping Meadow Land – aerial view**

4.19.8 The five key recommendations emerging from that report are:

- 1 - Bring back the UK's lost wildlife ✓
- 2- End river pollution and water scarcity ✓
- 3- Fund wildlife-friendly farming ✓
- 4-Enable healthy communities ✓
- 5 - Tackle the climate emergency by protecting and restoring natural habitats ✓

4.19.9 It is easy to see how careful management of the Gipping Meadow site could support recommendations 1, and 5 and perhaps even contribute to 2.

4.19.10 The reason it isn't being recommended by officers that the Council take the Gipping Meadow land for £1 from day one relates to the existence of an uncontrolled crossing for pedestrians that crosses the railway line immediately to the north of the site. The crossing allows walkers to cross the railway line and effectively provides a direct link between Great Blakenham and Barham. The uncontrolled nature of the crossing has resulted Network Rail formally trying to close the route in the past but the objection of Suffolk County Council meant the route remained open and in use. Network Rail has safety concerns due to the uncontrolled nature of the crossing as there is nothing to stop pedestrians from crossing the tracks in the path of oncoming trains.

4.19.11 Whilst Network Rail may have formally objected to any intensification of use of the crossing the fact that its use will remain unchanged means that the risk to pedestrians is unlikely to alter as it is not expected to generate increased pedestrian flows. Indeed the current proposal from Public Realm to restrict access in the interest of nature conservation and to create a limited number of circular routes around the site could mean that dog walkers and those out for a gentle stroll in nature may have less need to cross the railway lines to enjoy a good satisfying walk. The circular nature of the routes working to extend the linear distance you can travel whilst bringing you back to your original starting point.

4.19.12 The applicant owns the Gipping Meadow land and is willing to continue managing the site to the Council's specification and managing any additional liabilities that may bring.

4.19.13 On this basis the present status quo is maintained and therefore Network Rail cannot reasonably object to its continued use without intensification.

4.19.14 The continued use of the Gipping Meadow as grazing floodplain meadow and its management for biodiversity enhancement does not require planning permission although it is shown as being within the red-line, albeit as a separate remote parcel. It is within the ownership or control of the applicant and therefore its contribution to the overall biodiversity net gain of the Port One proposal is material, particularly when the Council is able to control its long-term management regime through a Section 106 Agreement and agreed Management Plan and if so desired triggering of the land transfer option for £1.

4.20.0 Archaeology

4.20.1 Suffolk County Council Archaeological Service has indicated appropriate Conditions.

4.21.0 Heritage

4.21.1 Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision taker must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. What this means is that a finding of harm, even less than substantial harm, to the setting of a listed building is something that must be given “considerable importance and weight” in the balancing exercise and this presents a ‘strong presumption’ against permission being granted.

4.21.2 This is reflected in the advice in paragraph 205 of the NPPF that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).” Consequently, any harm to, or loss of, the significance of a designated heritage asset from development within its setting should require clear and convincing justification (NPPF, paragraph 206). Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (NPPF, paragraph 208).

4.21.3 The Council’s Heritage Team has assessed that the proposal will result in a low level of Less than Substantial Harm to the setting of the group of Grade II Listed Buildings that includes Broomvale House and its associated buildings.

4.21.4 AJLP2023 Policy LP19 The Historic Environment reinforces the presumptions in Section 16 ‘Conserving and Enhancing the Historic Environment’ of the National Planning Policy Framework (NPPF) December 2023 – notably paragraph 195 which states:

“These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”

4.21.5 That said, Policy LP19 at paragraph 5 recognises that there may be occasions where harm to heritage assets may be allowed by exception. It states:

“When considering applications where a level of harm is identified to heritage assets (including historic landscapes) the Councils will consider the extent of harm and significance of the asset in accordance with the relevant national policies. Harm to designated heritage assets (regardless of the level of harm) will require clear and convincing justification in line with the tests in the National Planning Policy Framework.”

4.21.6 Paragraph 208 of the National Planning Policy Framework (NPPF) December 2023 is relevant because it deals with situations where a proposed development is identified as causing a Less than Substantial Level of harm to heritage assets. (as is the case here). It states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

4.21.7 Officers (DM) are of the strong opinion that in this case the proposed development does provide public benefits that outweigh the heritage harm that has been identified.

4.21.8 These include:

- The creation of up to 1250 new jobs
- Additional financial investment into the District at Port One of more than £400m
- Improvement works to Junction 52 of the A14
- Significant biodiversity benefits, including the creation of an 8.8ha nature area at the site known as Gipping Meadow with the option of public ownership for £1.
- Short-term construction jobs over the next 3-4 years
- An extensive package of improvements to community social infrastructure within the parishes of Barham, Bramford, Little Blakenham, Great Blakenham and Claydon and Whitton as agreed with the said Councils
- Green energy commitments and potential community access to Port One’s fleet of electric shuttle vehicles (details to be worked up)
- Commitment to working with the Council to enhance job prospects and skills within the community (details to be worked up)

4.21.9 This extensive public gain will not only generate economic benefits for the local and national economy as it underpins the Country’s import and export industry through Felixstowe and Harwich Ports but will also deliver social and overall environmental benefits.

4.21.10 The proposed development will by its nature encroach to some degree into the setting of Broomvale House and its associated buildings. Presently the listed properties look out onto the edge of the countryside albeit from across the busy B1115 and its own service road that runs parallel to the Bramford Road. To some degree the retained mature trees and hedgerow along the Bramford Road frontage to the application site will mean that immediate outlook will remain unaltered.

- 4.21.9 However, the fact that an extended Port One logistics Park will (if approved) sit behind this green foreground will sever once and for the listed buildings historic links with the countryside beyond.
- 4.21.10 The Heritage Team has assessed the Less than Substantial harm to be at a low level and it will still be possible to experience the listed buildings from some key public vantage points without the Port One development figuring in those views. Depending on landscaping detail to be further agreed, levels and building set back and height (within the outline application) it is impossible that the bulk and mass of the proposed buildings can be disguised or visually softened such that they do not unduly impose into the setting of the listed buildings.

4.22.0 Drainage

- 4.22.1 The site falls within Flood Zone 1 (very low fluvial flood risk), is not vulnerable to groundwater or reservoir flooding and is not in a designated critical drainage area. A small part of the site does however fall within an area with a medium to high surface water flood risk.
- 4.22.2 As the current application site falls within an area at a medium to high risk of surface water flooding, in accordance with policy LP27 and paragraph 168 of the NPPF, the sequential test is engaged. The aim of the sequential test is to steer development to the areas with the lowest risk of flooding.
- 4.22.3 By engaging the sequential test, the starting point is whether there are other reasonably available sites for the proposed quantum and type of development elsewhere in the district. No development should be permitted in areas at risk of flooding (from any source) if there are other reasonably available sites that are at a lower risk of flooding.
- 4.22.4 It is considered that there are no other reasonably available sites for the type and quantum of development proposed under this application. There are no extant unbuilt allocations for logistics in the district. Furthermore, under policy SP05 the applicant has clearly evidenced a need for this type of development in this strategic location. As the wider site has also been developed for logistics use and is supported by the necessary infrastructure, it is considered that the impacts arising from this development are best contained within and adjacent to existing logistics units, rather than an alternative new site. The sequential test is therefore considered to be passed.
- 4.22.5 In accordance with policy LP27 and paragraphs 169, 170 and 171 of the NPPF, the exception test is therefore engaged as the sequential test has been passed. The exception test is split into parts a) and b), both of which must be passed. Part a) requires development to provide wider sustainability benefits that outweigh the flood risk. Part b) requires the development to be safe for its lifetime, not increase flood risk elsewhere and where possible improve the overall flood risk.

4.22.6 Part a)

4.22.7 This development will if approved provide a significant level of sustainability benefits that are identified throughout this report. These benefits align with the three sustainability objectives in paragraph 8 of the National Planning Policy Framework December 2023.

4.22.8 For the avoidance of doubt these include:

- the creation of up to 1250 new jobs (economic and social benefits)
- an 8.8ha nature area (environmental and social benefits)
- improvements to Junction 52 of the A14 (economic and environmental benefits)
- the applicant has voluntarily offered community facilities (Unilateral Undertaking) (social and economic benefits)
- green energy generation (environmental and economic benefits)

4.22.9 Part b)

4.22.10 Units within Phase 1 have been approved with crated storage and series of drainage basins. As development has spread across the site the basin locations have been moved to accommodate the construction of units within that phase as units have been built sequentially rather than all at the same time. This has seen what are considered to be adequate solutions move round the site relative to the quantum of development being constructed with approval.

4.22.11 The present application if approved will provide a fixed permanent location for basins serving the entire development ie: the units now being proposed and those built previously.

4.22.9 On this basis and in the light of the LLFA's position the drainage aspects of this proposal are acceptable subject to the conditions recommended by the LLFA and meet the tests within paragraphs 168-171 of the National Planning Policy Framework December 2023.

4.23.0 Residential Amenity

4.23.1 Port One (Phase 1) (*now completed*) is located almost entirely within a wider predominantly commercial area although there are some residential uses to the west and south east. In the case of the former these are approximately 360m away to the nearest point and are largely separated from Port One by open countryside and more importantly an established wide tree plantation that runs along the eastern boundary of the Blakenham Estate (parallel with the western boundary of Port One). No part of Port One Phase 1 is higher than the top of the tree line with the Blakenham Estate Plantation. Existing houses to the south-east are separated from the south-east corner of Port One by the Bramford Road and their own service road with its own intervening planting and dense frontage flora along the western side of Bramford Road.

4.23.2 The nearest dwelling is presently some 125m away from the closest part of any building on Port One.

4.23.3 Mitigation included within that phase of development and the natural geography appear to have resulted in a generally harmonious coexistence from a residential amenity perspective. (avoidance of unacceptable nuisance and disturbance as well as direct impacts such as loss of privacy, harm to outlook, overshadowing daylight/sunlight infringements).



figure 54: **Adjoining Uses**

4.23.4 In terms of impact upon residential amenity the current proposal is unlikely to result in any new levels of harm for the reasons it has not done so in respect of Phase 1 as described above.

4.23.5 However as the proposed development pushes development further south the impact it may have on the residential amenity presently enjoyed by properties on the east side of Bramford Road (south east of Phase 1) does need to be carefully considered.

4.23.6 On the map below the physical extent of the proposed Phase 2 (full) and Phase 3 (outline) is shown in the context of existing dwellings.

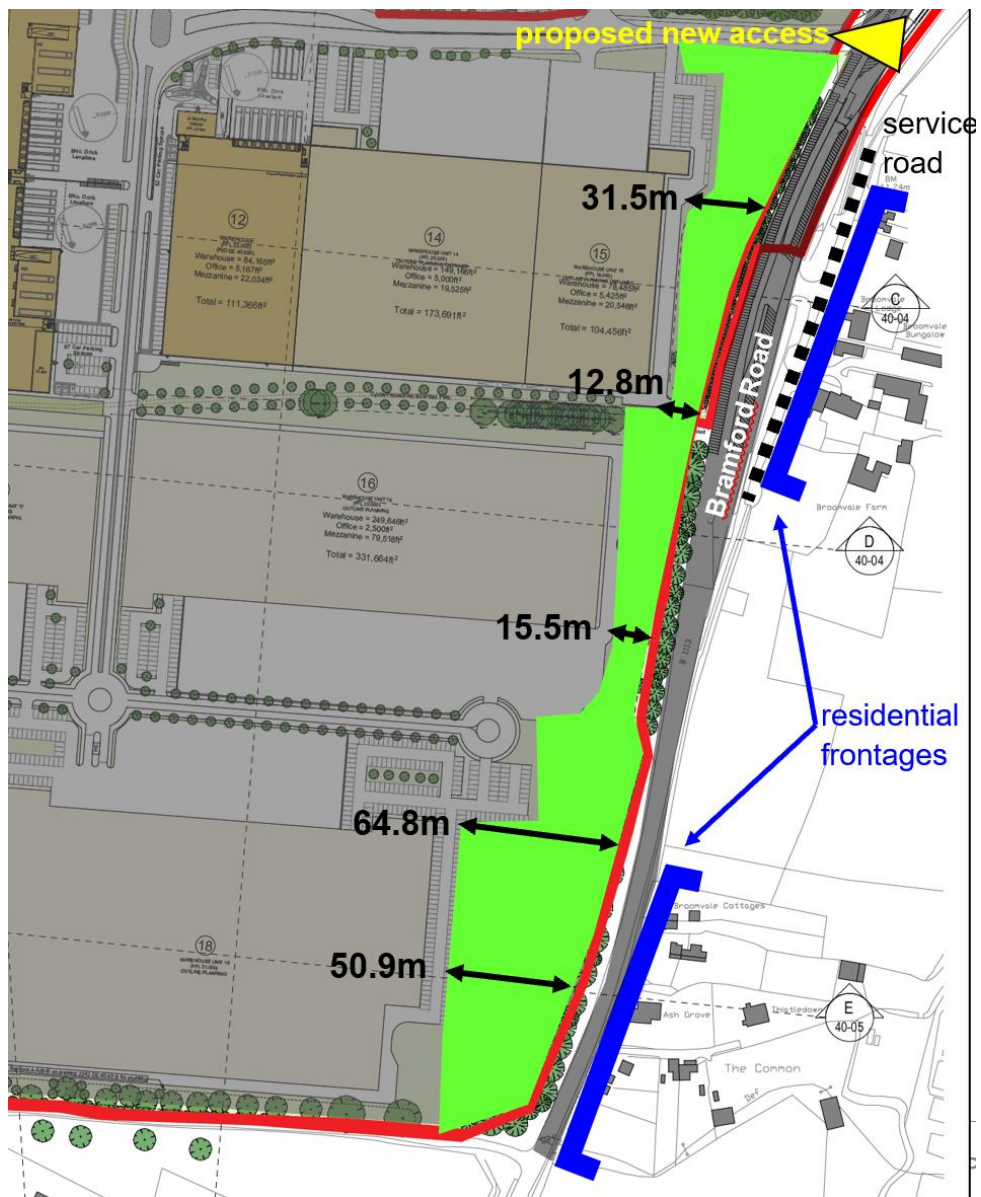


figure 55: **Proposed Landscape Buffer depths – Bramford Road Frontage**

4.23.7 It is recommended that all external lighting be the subject of a condition requiring further and full lighting details to be submitted in the event that Members are minded to approve the application. This is in order to ensure that adequate attention be given to the need to safeguard the amenity of nearby residential properties from undue nuisance from excessive light glare and in order to ensure that all external lighting is wildlife sensitive. It is also appropriate for the Council to ensure that any external lighting does not contribute unnecessarily to excessive sky glow.

4.24.0 Control over Use

- 4.24.1 This hybrid application is described on the application form as pertaining to the erection of warehouses (FULL) and the creation of warehouse plots (OUTLINE). This is consistent with the applicant's intended and expressed ambition to extend the existing logistics park, known as Port One.
- 4.24.2 Storage and Distribution (warehousing being the staple of logistics) is defined in the Town and Country (Use Classes) Order 1987 (as amended) as a Class B8 Use – 'Storage and Distribution'
- 4.24.3 The merits of the proposal have therefore been assessed on the basis that the intended use does not fall within any other Use Class.
- 4.24.4 This is important because the intended use does not fall within Class E or Class B2.
- 4.24.5 Class E introduced as an amendment to the 1987 Order under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 includes what are now defined as '*Commercial, Business and Service uses*'.
- 4.24.6 These now include use or part use for retail, sale of food and drink principally to visiting members of the public, services principally to visiting members of the public (eg financial services) indoor sport, recreation, medical or health services creche day nursery or day centre, office research and development, light industry. Port One is and has been assessed solely as a logistics park. Class E use/s are likely to generate impacts that have not been assessed here. (eg: retail impacts on the vitality and viability of existing centres, such as Stowmarket and/or Needham Market Town centres.
- 4.24.7 Similarly the current application is not intended to facilitate 'General Industrial' B2 uses. Such uses would permit a general business park, such as the likes of Gateway 14. Port One is and has been assessed solely as a logistics park. B2 use may bring with it impacts that have not been assessed here. (eg parking requirements, traffic generation).
- 4.24.8 Whilst it may be obvious to everyone what is being proposed and into what Use Class it falls the planning landscape is constantly changing and the Use Classes categories may at some point be changed again in ways that we cannot foresee. It is therefore prudent to take a precautionary approach particularly when the proposed use is so specific and has been assessed on that basis.
- 4.24.9 Therefore, for the avoidance of doubt if Members are minded to grant planning permission then, it is recommended that a condition be attached to any such permission making it clear that the permitted use is for Class B8 ONLY (with ancillary office space) and for no other use irrespective of changes to the Uses Classes Order in the future.
- 4.24.10 Similarly it is recommended that no additional floorspace can be added to any building without further planning permission. This is because the proposed buildings have significant void space (circa 18-20m) and the introduction of new intervening floors (or

mezzanines) is likely not to constitute development. Significant increases in floor area beyond that approved after careful assessment of the planning implications of that quantum of floor area could result in unacceptable unforeseen impacts that then could not be properly controlled or mitigated. (eg: on-site parking provision. traffic generation).

4.24.11 Similarly whether or not permitted development rights currently apply to B8 uses any ability to extend premises without the need for planning permission should ne removed for similar reasons.

4.24.12 This might best be achieved by the addition of a condition that restricts the total floor area and layout within each building to that approved and that the creation of any new floorspace (whether internally of externally) requires further planning permission.

4.25.0 Policy Analysis

4.25.1 Provided below is a high-level summary of the extent to which officers consider the proposed conforms with policies relevant to the matter at hand. As a summary it will have its deficiencies and must by its nature include generalisations and to some degree expressions of subjective judgement.

4.25.2 Its purpose is to provide Members with a quick reference but not is not designed to supplant detailed analysis in the report or differences of opinion, weighting and interpretation that may emerge from further debate and discussion at the meeting.

Policy number	Policy title	Comments
SP03	The Sustainable Location of New Development	<ol style="list-style-type: none"> 1. n/a as this is not a residential proposal 2. (c) and table 5 are met
SP05	Employment Land	<p>(a), (b), (c) & (f) met.</p> <p>(d) adequate mitigation and compensatory provision is being provided (ecology/landscape/biodiversity) for the initial harm to the natural environment.</p> <p>The development will cause a low level of Less than Substantial Harm to designated heritage assets (built environment) but this outweighed by the public benefits</p>

		<p>that arise from the development. (paragraph 208 NPPF (December 2023) (also see LP19)</p> <p>(e) whilst the entire site is not previously developed land this is not fatal to the prospect of success for the reasons discussed in the report</p>
SP09	Enhancement and Management of the Environment	<p>Meets (1) (4 with conditions on outline)</p> <p>(2 n/a) (3 n/a) (5n/a)</p>
SP10	Climate Change	<p>a. Flood impacts considered and mitigated</p> <p>b. Hybrid SuDs being used with condition to be added to outline requiring further water management</p> <p>c. Met</p> <p>d. Partly embraced through extensive pv coverage (see sustainability section of this report) and S106 community initiatives</p> <p>This Phase of development will build upon the raised benchmarks it delivered within the District for greener commercial development</p>
LP09	Supporting a prosperous economy	<p>1.</p> <p>a. with the proposed mitigation the development is generally sensitive but it is accepted that a large state of the art modern logistics park is unlikely to be entirely sensitive to its surroundings</p> <p>b.met</p> <p>c. met</p> <p>d. met</p>

		<p>This proposal represents the expansion of a very successful business on a site adjacent to its present location.</p> <p>The economic benefits of this proposal are explored in detailed in this report</p> <p>2. n/a as this is not a residential development</p>
LP15	Environmental Protection and Conservation	<p>2. met It is noted that the site is not previously developed land but justification for its use is provided in this report</p> <p>3. met</p>
LP16	Biodiversity & Geodiversity	The Gipping Meadow offer as a biodiversity enhancement area is a significant gain
LP17	Landscape	This logistics park will have to some degree a harmful impact on the landscape hereabouts. Mitigation is provided including recontouring to lower the ground level and therefore relative height of the buildings, camouflaging of buildings with sensitively coloured and organised banding, extensive new planting, bunding
LP19	The Historic Environment	The development will cause a low level of Less than Substantial Harm to designated heritage assets (built environment) but this outweighed by the public benefits that arise from the development. (paragraph 208 NPPF (December 2023) (also see SP05)
LP23	Sustainable Construction and Design	<ol style="list-style-type: none"> 1. Embraced 2. n/a as this is not a residential development 3. will be conditioned 4. met (very good is proposed) 5. n/a as this is not a residential development

LP24	Design and Residential Amenity	Overall this proposed development achieves a good standard with it unlikely to result in unacceptable harm to residential amenity such as to warrant refusal of permission
LP25	Energy Sources, Storage and Distribution	Met 3. n/a as the site is not within or near an AoNB
LP26	Water resources and infrastructure	1. see above SP09 2. 3. 3. 4. 5 met 6 n/a as site is not a designated site
LP27	Flood risk and vulnerability	LLFA does not object
LP28	Services and Facilities Within the Community	Unusually for a commercial development it includes a raft of community benefits agreed in principle with local parish councils and the Development Management, Communities and Public Realm services. Such benefits to be secured by a suitable S106 Agreement
LP29	Safe, Sustainable and Active Transport	Proposal is agreed with SCC Highways and National Highways has no objection. Scheme include electric shuttle vehicles for staff (with 'in principle' off peak community access [S106] cycleway improvements and pedestrian realm improvements. Highway improvements including to Junction 52
LP30	Managing Infrastructure Provision	The proposed development will meet its infrastructure needs
LP32	Developer Contributions and Planning Obligations	The development is accompanied by an extensive S106 package

4.26.0 Legal Agreement Matters

4.26.1 Section 106 Agreement matters

4.26.2 If Members are minded to grant planning permission then the following mitigation is recommended to be secured by way of a Section 106 Agreement

Gipping Meadow Nature Area

- Land to be retained in freehold ownership of Curzon de Vere/Port One. (with MSDC purchase option)
- Public to have access to land at all times.
- Land to be managed by Curzon de Vere/Port One, at its own expense, in accordance with a management agreement to be agreed with Mid Suffolk.
- Mid Suffolk Council to have right to buy freehold for £1 (at any time).

Electric shuttle vehicles

- Provision of two 15-seater electric mini-buses, the first to be operational no later than simultaneously with the first of the FULL permitted units being brought into beneficial use, the second no later than simultaneously with the first of the units within with the OUTLINE area being brought into beneficial use. Earlier provision is therefore permitted if the applicant chooses to do so.

Employment Training Co-operation

- Port One to explore with MSDC Economy Team and other relevant agencies initiatives to provide training/.mentoring/support for local people to improve their prospects of entering the jobs market. This initiative does not require financial contribution but rather access to opportunities within Port One or access to skills and people to share those skills

Travel Plan

- Update, as necessary, Port One's Mode shift STARS¹⁶ online Travel Plan.

4.26.3 Unilateral Undertaking matters

- 4.26.4 If Members are minded to grant planning permission then the community benefits voluntarily promoted by the applicant should be offered by way of a Unilateral Undertaking

¹⁶ Modeshift STARS is the Centre of Excellence for the delivery of Effective Travel Plans in Education, Business and Residential settings. The scheme recognises schools, businesses and other organisations that have shown excellence in supporting cycling, walking and other forms of sustainable and active travel.
<https://modeshiftstars.org/>

Great Blakenham Park Council

- Village Hall - Install PV's on suitable roof slopes.
- Parish Room - Install PV's on suitable roof slopes or, as an alternative, a comparable ground array.

Claydon and Whitton Parish Council

- Village Hall - Install PV's on suitable roof slopes.

Barham Parish Council

- Community building - Install PV's on suitable roof slopes of one community building.

Bramford Parish Council

- Lorraine Victory Hall - Install PV's on flat roof.

Little Blakenham Council

- Port One to provide scheme drawings and to provide pv. Applicant may consider further support but LBPC is expected to utilise CIL and other funding sources where appropriate

GP Access Scheme/Community Access to Electric Shuttle Vehicles

- Port One to engage with Parish Councils and Needham Market Country Practice with the aim of setting up a GP Access Scheme using Port One mini uses during quiet times between shift changes at the Logistics Park. Port One also to explore other opportunities to facilitate access to the electric shuttle vehicles during off-peak times to improve accessibility and connectivity locally to key facilities and services beyond the local villages.

4.26.5 Grampian Condition¹⁷ Matters

4.25.6 Suffolk County Council Highways has recommended that Junction 52 improvements and the new access works be the subject of a Grampian Condition rather than Section 106 Agreement as this will mean all the actual costs of delivery fall on the developer. A Section 106 Agreement can secure a specific sum of money from the developer to implement the

¹⁷ A "Grampian condition" is a planning condition attached to a decision notice that prevents the start of a development until off-site works have been completed. Its name reflects the Authority where such a condition was first used.

works but if subsequently the cost of implementation exceeds the secured funding, then those costs are likely to fall on the public purse.

4.25.7 The use of Grampian Conditions to secure highway works is an established method of delivery.

PART FOUR – CONCLUSION

5.0 Planning Balance and Conclusion

5.1 This proposal is considered to conform to the following relevant policies of the Adopted Joint Local Plan for reasons explored in the Assessment Section of this report.

- SP03 (2)(c) (this being in the basket of most important policies for the determination of this application)
- SP05 (this being the most important policy for the determination of this application)
- SP09 (1) (4) (this being in the basket of most important policies for the determination of this application)
- SP10 (this being in the basket of most important policies for the determination of this application)
- LP29 (this being in the basket of most important policies for the determination of this application)

These therefore attract significant weight in favour of approving this application. Overall and in the round officers consider that the application accords with the development plan when read as a whole.

Indeed paragraph 11 of the National Planning Policy Framework December 2023 -states that:

“11. Plans and decisions should apply a presumption in favour of sustainable development.....

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay”

5.2 The proposal also generally accords with :

- LP09
- LP22
- LP24
- LP26

LP27
LP28
LP29
LP30
LP32

and this attracts moderate weight.

- 5.2 Where the proposal conflicts with the principle of heritage protection in policy **LP19 (also in the basket of most important policies)** officers are of the view that paragraph (5) of the Policy applies. Having assessed the public benefits that arise from this development as described in section 4.21 of this report and having applied the test on paragraph 208 of the National Planning Policy Framework December 2023 these are considered to materially and significantly outweigh the identified low level of Less Than Substantial Harm to the setting of the four Listed Buildings on the east side of the B1115. (Broomvale and its associated buildings)
- 5.3 It is acknowledged that the proposal will result in some tree loss and the landscape hereabouts will be altered contrary to principles in policies LP15, 16 and 17. Officers are however of the opinion that proposed mitigation will provide an acceptable solution that when weighed in the balance is something that will in the longer term provide its own environmental benefits. Included in this is the creation of a nature area on the site known as Gipping Meadow (8.8ha), new wet woodland areas and planting buffers.
- 5.4 Whilst the initial adverse impact attracts moderate weight, the longer-term benefits counteract that impact and it is expected that overall there will be a significant biodiversity net gain, although the immediate landscape will have changed.
- 5.5 The prospect of development hereabouts is not unexpected as the planning history of the site is such as to include permission/s for large industrial style buildings over much of it. Not all these have been built out but other parts of those proposed development can be seen constructed to the south (tomato growing building) and north. (parts of Phase 1 Port One)
- 5.6 The proposal will not result in unacceptably high harm to the amenity to nearby properties.
- 5.7 In conclusion the proposed development is policy compliant in respect of five of the six most important policies for the determination of the application. Similarly it is generally compliant with 8 (eight) of the other 10 (ten) relevant policies. (with the use of conditions in certain instances)
- 5.8 Where it conflicts with the principle of heritage protection in Policy LP18 officers are satisfied that having undertaken the test in paragraph 208 of the National Planning Policy Framework December 2023 the public benefits that will arise from the proposal if approved will overwhelmingly outweigh the identified low level of Less Than Substantial Harm to designated heritage assets even where considerable importance and great weight is afforded to that harm.

- 5.9 The application accords with the development plan as a whole and there are no considerations which otherwise direct that permission should be refused contrary to the direction of the Plan.
- 5.10 **The proposal is, subject to first securing the offered mitigation (as described in Section 4 of this report) by Section 106 Agreement and receiving an appropriate signed binding Unilateral Undertaking from the applicant to underpin their offers of community benefits voluntarily made by them to various parish councils (as also described in section 4 of this report) along with the addition of appropriate conditions, ACCEPTABLE**

RECOMMENDATIONS follow overleaf....

6.0 RECOMMENDATION

That,

▶ (i) Subject to the prior completion of appropriate binding Legal Agreement/s that secures the specific matters identified in section 4.26 of this report to the satisfaction of the Chief Planning Officer,

▶ (ii) The Chief Planning Officer is authorised to GRANT:

A: Full planning permission (*with appropriate conditions*) for the

“Erection of 3 no. warehouses and new vehicular access. Extension of estate roads, boundary landscaping, biodiversity enhancement and SuDS”*

(* on the Gipping Meadow Land - to be secured by S106 Agreement)

and;

B: Outline planning permission (*with appropriate conditions*) for:

“Further estate roads and six warehouse plots” (Only ACCESS and LANDSCAPE to be determined)

However,

▶ (iii) In the event that such Agreement/s is /are not signed within 6 months of the date of the Committee resolving to agree the recommendation to approve the applications in this report (or any amendment to approve) or such subsequent extended time period as The Chief Planning Officer considers reasonable to secure the Agreement/s, where there is in his opinion a realistic prospect of it being completed within such an extended period;

Then;

The application be referred back to Committee for further consideration and determination.

Recommended conditions follow.....

RECOMMENDED CONDITIONS to include....

FULL:

Conditions

1. Reference to source outline permission and commencement expiry date.
2. Approved drawings (*subject to any further detail required by other conditions.*)(*but exclude outline elements on any drawing*)
3. Restriction on permitted use/s to B8 with ancillary office space only.
4. Gipping Meadow use for managed nature area (which may include grazing of livestock), biodiversity enhancement, interpretation and ancillary informal recreation
5. No open air storage, waste, containers
6. All external plant to be subject of further approval if not shown
7. White noise reversing alarms
8. No new floorspace beyond that approved here to be created within buildings without the further written approval of the lpa.
9. No external extension to any building/s without the further written approval of the lpa.
10. Boundary details
11. Delivery of green corridor
12. Further full details of landscaping to Bramford R padd frontage
13. as required by SCC Highways including Grampian elements for access and junction 52 (A14) improvements.
14. as required by the LLFA.
15. External Lighting details
16. Further full landscaping details (Including bunds) and wet woodland & LEMP
17. Phasing plan
18. Archaeology
19. Fire hydrants
20. Construction Environmental Management Plan (CEMP) for Biodiversity
21. Biodiversity Net Gain Plan (BNGP)
22. Wildlife sensitive lighting
23. Green corridor to be provided prior to occupation of the first unit
24. Biodiversity Enhancement Strategy (BDS)
25. Tree protection measure details
26. as required by climate change team and as considered appropriate by CPO
27. On site foul water details
28. Commercial noise attenuation
29. Ongoing noise levels
30. Assessment and Noise Management Plan
31. Ongoing noise management
32. Lighting assessment
33. External lighting details and controls + wildlife sensitive

34. Construction hours
35. Construction Management Plan (CMP)
36. Parish Liaison Scheme
37. Further details of levels and ecowall in vicinity of FP21
38. as may be reasonably required by Committee
39. Such other condition/s as are considered reasonable and appropriate by the CPO

OUTLINE:

Conditions

1. Standard time limit.
2. Reserved Matters. To include pre and post development levels and site cross sections
3. Restriction on permitted use/s to B8 with ancillary office space only.
4. Gipping Meadow use for managed nature area (which may include grazing of livestock), biodiversity enhancement, interpretation and ancillary informal recreation
5. No open air storage, waste, containers
6. All external plant to be subject of further approval if not shown
7. White noise reversing alarms
8. No new floorspace beyond that approved here to be created within buildings without the further written approval of the lpa.
9. No external extension to any building/s without the further written approval of the lpa.
10. Boundary details
11. Delivery of green corridor
12. Materials details
13. Statement in respect of importation and exportation of soil etc onto/from site
14. Additional landscaping details.
15. Additional bunding detail to western and southern boundaries.
16. as required by SCC Highways.
17. Travel plan
18. as required by LLFA.
19. Notwithstanding submitted detail further full landscaping details (Including bunds) & LEMP
20. Phasing plan
21. Archaeology
22. Fire hydrants
23. Construction Environmental Management Plan (CEMP) for Biodiversity
24. Biodiversity Net Gain Plan (BNGP)
25. Wildlife sensitive lighting
26. Biodiversity Enhancement Strategy (BDS)
27. Tree protection measure details
28. Commercial noise attenuation
29. Ongoing noise levels
30. Assessment and Noise Management Plan

31. Ongoing noise management
32. Lighting assessment
33. Lighting control
34. Construction hours
35. Construction Management Plan (CMP)
36. Further details of levels and ecowall in vicinity of FP21
37. On site foul water details
38. No vehicular access to/from Pound Lane
39. LVIA
40. Parish Liaison Scheme
41. as may be reasonably required by Committee
42. Such other condition/s as are considered reasonable and appropriate by the CPO