

DC/19/05093 | Outline planning application (some matters reserved - access to be considered) - Commercial development for flexible employment use

Land To The North And East Of Bobbits Lane Wherstead Suffolk

**REPRESENTATIONS ON BEHALF OF THE STOUR & ORWELL
SOCIETY**

1. The Stour & Orwell Society (“SOS”) is constituted to preserve and enhance the amenities of the Stour & Orwell component of the Suffolk Coasts & Heaths AONB and its adjoining Additional Project Area. Members of SOS live, work and recreate in this area and are extremely familiar with both the AONB and its wider setting. They walk, cycle, ride, sail and drive through the AONB on a very regular basis and are acutely aware of the sensitivity of the area to development – especially the fragility of the natural beauty of the area where it approaches the Ipswich urban area.
2. The application site lies just outside the formally designated AONB, but it closely related to it: it sits alongside one of the main vehicular approaches to the heart of the AONB for visitors, down Bourne Hill and then right opposite Bourne Bridge to the Strand. Coincidentally, it also forms a key part of the landscape setting of the town of Ipswich, which sits largely in a bowl, surrounded by attractive undeveloped areas, studded with copses and ancient woodlands, many of which have their origins as part of the girdle of estates and farms which once ringed Ipswich (to the south, represented here by

Wherstead Park and Stoke Park). For many thousands of travellers daily, the approach to Ipswich (and to the Strand) down Bourne Hill with attractive fields and woodlands framing the view is highly valued. Limited consultation by Babergh DC on an ad hoc planning application such as this, will, SOS fears, simply fail to capture the scale of objection to the loss of an open rural setting to Ipswich and to the AONB, if the application site is developed with an extensive range of industrial/warehouse buildings.

3. The Council commissioned a detailed Report (from highly regarded landscape professionals Alison Farmer Associates) to assess the Landscape Fridges of Ipswich in June 2018 as part of its development plan evidence base. This Report considers the application site as part of area IP4 (section 4.5, page 21). The study finds: "The rural slopes of Bourne Hill are also sensitive to development which may impact upon the setting of the AONB and alter the rural river valley gateway into Ipswich on the A137 at Bourne Bridge." This assessment made in the Council's own study accords with SOS's view.

4. This leads to SOS's first point of objection: the scale of built development proposed in this highly visible and prominent location is not acceptable. The objection is compounded by the wholly inadequate level of information submitted with the application. We have been unable to find details of the height and therefore bulk of the buildings proposed, nor to undertake a proper assessment of the landscape and visual impact. The Council MUST insist on

the submission of a LVIA if it is not minded to dismiss this application on other grounds.

5. The other salient feature of the application is that it calls to be assessed and considered alongside a suite of other development proposals at Wherstead: a major roadside services area, “drive through” restaurant and lorry park to the North of J56 and further extensive development to the south (described in the TA as Mixed Use “Resi + Ind Est 50/50”), all promoted in conjunction with a major re-modelling of Junction 56 – none of which is supported by a development plan allocation. And yet the Council is at this very moment putting together its development plan to address its development needs comprehensively and, SOS hopes, to insist that these needs are met in the most sustainable way.

6. SOS considers that individual - and especially the cumulative - impact of the scale of the development currently proposed around Junction 56 calls for critical and comprehensive examination as part of the development plan process. This objection is reinforced in circumstances where the location is patently an unsustainable one, with even the TA predicting a mere 2% of trips by public transport, and 83% single car occupancy. In fact, SOS strongly doubts that the proposed commercial development will attract more than handful of walk or cycle trips, as it is at an isolated location at the top of a steep hill.

7. Additionally, as we have said elsewhere in recent consultation responses, the rash of development proposals at Wherstead calls for proper study by the Council of the broader landscape and heritage implications of visiting these levels of development on a small rural settlement, with a high concentration of listed buildings. It is apparent from the submitted documentation, that there is an inadequate appreciation of the importance of Wherstead's landscape, its history and, for example, the role played in its present form and appearance by one of the UK's foremost landscape gardeners, Humphrey Repton. Wherstead is also awash with listed buildings and Babergh DC has, in the recent past, indicated the potential for the designation of a conservation area at the village. Accordingly, SOS strongly requests that Babergh DC commissions a full review of the landscape and heritage significance of Wherstead village and Estate before approving any of the current series of planning applications. Without doing so, SOS considers that there is a real risk that serious errors will be made and Babergh DC will fail to discharge its obligations in relation to Areas of Outstanding Natural Beauty or heritage assets. In this context, SOS also notes that the new Arm F of the junction is pointing directly at the magnificent original Georgian walled garden of Wherstead Park, with no apparent scope for avoiding it. This is unacceptable.
8. SOS has become increasingly concerned in recent years about the presence of extensive queuing traffic in the AONB and APA and the extent to which this detracts from natural beauty and causes air quality to deteriorate to the detriment of those enjoying informal recreation in the area.

9. It is now absolutely commonplace for there to be a queue at least 2 miles long tailing back south down the A137 from Junction 56 for the majority of the AM peak period. This is caused by the sheer weight of traffic approaching J56 from the south (including those diverting from A12 to avoid the Copdock interchange) and drivers on the A137 necessarily waiting for cars with priority from the right to pass before they can negotiate the junction. The proposed re-modelling of the junction does not seem to increase its capacity or provide additional lanes. Instead, it is focused upon providing two new accesses – essentially to serve a substantial quantum of new development to the north and south, which will itself have to use the junction.
10. Moreover the TA for the RSA (upon which this application relies) predicts yet another 60 priority movements (ie movements turning *across* traffic wishing to proceed north across the junction) in the AM peak, which will cause the lengthy northbound queuing traffic on the A137 to wait still longer for an opportunity to enter the junction. This is comprised of cars leaving the A14 westbound off slip to visit the RSA and then the return moment to re-join the A14 using the westbound onslip: see RSA TA, Figure 8 (29+29 movements). The TA is also supposed to factor in 300 employees arriving at the application site, although the assessment has only 71 arriving in the AM peak (from all directions) which seems unrealistically low (25%). What is most astonishing is that the TA¹ seems to predict a queue of 4.5 pcus/vehicles on the A137 south arm. This seems to defy both logic and the experience of the past decade, especially when there will be no increase in the capacity of the junction and

¹ Main TA, Table 7.2

far more development traffic loaded onto it – via the two new arms which will themselves impact upon its functioning.

11. Accordingly, the Council is expressly requested to confirm that it has very carefully audited the TAs and to provide an explanation for the means by which the queue on the A137 northbound to J56 in the AM peak is said to be 4.5 vehicles, rather than the many hundreds currently observed on an almost daily basis.

12. In summary, SOS is gravely concerned about the following matters:

- i. The individual and cumulative impact of the current Wherstead proposals upon the setting of the AONB and APA and the valley approach to Ipswich;
- ii. The urgent need for a comprehensive landscape and heritage assessment of Wherstead;
- iii. At the very least, a full LVIA of the current proposals should be produced;
- iv. The effective by-passing of the development plan process by these applications. By what means has it been established that there is a need for commercial sheds at this location and that there are no more sustainable alternatives?