

## **HGV concerns - SCC & BMSDC response letter**

Fm: Sue Ives

Wed 05/08/2020 10:11

To: Stradbroke Parish Council

Dear All,

**Parish Clerks please forward to your Parish Councillors as soon as possible.**

Please see below - this is the letter that Arthur Charvonia (Chief Exec BMSDC) and Nicola Beach (Chief Exec SCC) sent yesterday in reply to the concerns we raised about HGV movements related to Industrial Poultry Unit developments in the district (in our letter dated 6th July 2020, which was emailed to Parish Clerks for distribution on 6th July).

Both Chief Execs are aware that we are circulating their letter dated 3rd August 2020 to your Parish Councils for information and are also aware that we intend to respond to the content.

If any of you wish to raise points of relevance to be considered in our response, then please let me know as soon as possible.

Kind regards,

Sue Ives

(and on behalf of Elizabeth Gibson-Harries & Jill Erben)

Letter attachment titled: Intensive Poultry Unit Development in Mid Suffolk

## HGV concerns - SCC & BMSDC response letter

Fm: Chris Edwards Wed 05/08/2020 16:10

To: james.cutting@suffolk.gov.uk ; michelle.gordon@babberghmidsuffolk.gov.uk

Cc: Elizabeth Gibson-Harries; Jill Erben; lewisjml; Jane Gilmore; Marion Ravenhill; James Hayward; Adrian Smith; michael howard; aa.nunn; 'Sue Ives; Denham Parish Council; Eye Town Clerk; Rod Caird; Hoxne Parish Council; Redlingfield Parish Council; Geoff Chriben; Stradbroke Parish Council; Amanda Thompson; Julie Collett; Worlingworth Parish Clerk.

Approved for circulation today by the SPC Planning Committee for reference at SPC meeting Monday 10<sup>th</sup> August

fao

Arthur Charvonia

Chief Executive Officer

Babergh and Mid Suffolk District

Councils'

Nicola Beach

Chief Executive Officer

Suffolk County Council

Dear James and Michelle

Two sentences in the response letter from the CEO's of SCC and BMSDC, copied to us by Sue Ives, set out the economic future of the district and the way SCC/MSDC propose to manage the poultry issue. The response is very light on methodology, this is necessary to enable a clear focus. I hope this response will assist in setting out a modelling approach which can quantify the problem using evidence based figures and not statements of intent

"Whilst **poultry processing and distribution will tend to use a supply-chain around a 10-mile area**, there are farms and other related firms over a much wider area including Breckland, St Edmundsbury, South Norfolk and even Tendring districts and **it will take time to fully understand the complexities of this supply chain.**"

"Following consideration of the comments made during the consultation on the **Joint Local Plan Preferred Options document (July 2019)** regarding intensive farming, **the councils are currently considering the addition of a policy in the Joint Local Plan to address agricultural buildings.** An updated Local Development Scheme has been approved by Mid Suffolk District Council at their Council meeting on 23 July 2020, which identifies that the next iteration of the Joint Local Plan is proposed for consultation towards the end of 2020."

I suggest the letter simply plays for time. So many factors are known that we can make some confident assumptions about the impact of the factory now. This has not been done as I show below

The processing capacity of the factory is conservatively 62 million chickens per year. It has a permit. The equipment supplier boasts the facility can process 15000 birds per hour. Cranswick have made no secret of their intentions to expand the factory.

Conservatively therefore a maximum capacity is 100 million birds per year although if it ran all the time this number grows to 132 million birds per year (15000 x 24 x 365). We recognise that is probably not feasible hence the 100 million bird per annum assumption.

A simple maths sum request to Cranswick will show what the current supply chain can provide to the factory. This will show the difference between current supply and the 62 million birds per year capacity. The difference can be modelled as an input to assess cumulative impact based on the above statements. This is the traffic impact of xx million birds and associated support within a 10 mile radius of the factory.

There is considerable evidence from Suffolk and from Shropshire that a 4 shed broiler unit providing 1 million birds per year generates a minimum of 3000 vehicle movements per year.

The evidence base supporting the Draft BMSDC Local Plan is the WSP transport report . The report findings have been used to support the draft Plan policies and the Sustainability Appraisal. However no modelling assumptions of this sort have been considered. The wider factory impact is therefore not modelled in the WSP report to inform strategic policies, it is not even referenced in relation to local policy Eye Airfield policy site. The poultry production model is well known, the letter confirms this. That the factory neither received an EIA when it was over the Schedule 2 threshold nor that any cumulative impact of the poultry business supply chain model is included in the evidence base supporting the Local Plan either at strategic or local policy level are matters of profound concern.

If 1 million birds generate 3000 new vehicle movements per year, the narrow question for SCC and MSDC is : what is the local lorry route capacity for the factory if it expands to full production? Modelling options can consider various growth impacts on the few distributor roads that exist. As this has not been done we can only assume the worst, and that all the shortfall will come from the 10 miles east of the A 140.

NPPF sustainable development has three objectives within which traffic impact must be considered :

*NPPF Para*

*8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with*

*accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

Stradbroke PC argues that economic objectives have been prioritised over social and environmental objectives without clear justification, and the evidence base as stated is not sound.. The district lacks capacity for a further 40 million birds per year over 60 million and the consequential additional 120,000 new road movements. That increase does not take account of the unquantified shortfall existing between current production level and current capacity.

The actual modelling assumption gap over 20 years taking account of the uplifts is therefore likely to be in the region of 60-70 million birds. None of these those movements have not been modelled. A worst case model is therefore 210,000 new movements per annum in the MSDC area generated by the factory. It is truly a monster. This does not include any additional movements from housing or other development in the district.

We therefore await publication of the local plan with some interest. The evidential omission of the traffic modelling as stated is of such a significance as to make the draft plan unsound. The addition of a new policy regarding use of agricultural buildings will not alter this position. The revival of the Poultry Panel is a sop. The unique road network of the District is self evident ; there are very few options for traffic movement to and from the factory and the power plant in a 10 mile half radius east of the A 140.

A Local Plan considers the 20 year position. The wider policy issue is whether poultry or people are more important. That will be the defining legacy issue for members Chief Executives and senior staff. And of course there is now the emerging evidence of the biohazard risks of mass poultry production which is a potential game changer. SPC has noted this also in its responses.

Just because the poultry production map for the region is dark brown does not justify further intensification. That is not a sound argument. We reserve the right to make use of the CEO letter in the next consultation round to support our case that economic objectives have unjustifiably taken precedence over the other core objectives social and environmental and to their detriment and that draft policies fail to address this imbalance.

I would appreciate James and Michelle forwarding the letter to their respective CEO's for their consideration of the scale of the traffic movements.

Kind regards

Chris Edwards  
Councillor SPC /Chair SPC Planning Committee