

PART 1 – OBJECTIVES AND STRATEGIC POLICIES objection

03 - Vision and Objectives

Stradbroke Parish Council supports the Plan objectives but comments that they are conflicted by the rise of the intensive industrial poultry farming industry. This is unrecognised in the plan and on a scale and intensity not imagined even in recent years.

It is of such a scale and so unrecognised in the plan that Stradbroke Parish Council fears it risks making the entire plan unsound. This is because it impacts on every single area of the draft plan. This is reflected in the lack of recognition and lack of planning to account for and monitor the industry.

Housing

Stradbroke Parish Council fully supports the Local Plan's endorsement of the Stradbroke Neighbourhood Plan in relation to planned growth in the village. Stradbroke Parish Council considers the made NP to be a good example of effective and co-ordinated working between Parish and District Council to plan for long term sustainable development. However, the village is on a main Suffolk County highway route (see Stradbroke Parish Council response to Sustainability Appraisal Appendix 6). This will have potentially significant huge impacts on both the made NP policy and the wider Parish area.

Economy:

Stradbroke Parish Council supports development of employment sites in general; especially expansion of those in Stradbroke which can promote local jobs. However, Stradbroke Parish Council refers to the joint statement made by the local councils in relation to the intensive industrial poultry farming proposals in Eye, which takes no account of cumulative impact on the area and whose impact in scope and scale is equivalent of an infrastructure project.

Suggested change: Local infrastructure improvements to be a separate objective complementing economy. This section needs to include road improvements within the district. Separately the new objective must focus on improving local internal connectivity, by means of public transport, and not simply reflect connectivity needs with a major regional port (Felixstowe).

Environment: - this must be strengthened to name and include specifically polluting waste such as by-products of the intensive industrial poultry farming industry. The intensive industrial poultry farming business model has not evidenced how to dispose of waste other than to burn on site or to spread on fields at source. Neither of these methods will be effective to cope with the industrial scale of the planned business and foreseeably significant environmental harm will ensue if not strengthened. This cannot be left to environmental permitting regulations; the plan must take a lead as it is a strategic issue

Healthy communities; this must reflect the intensive industrial poultry farming issue since if quality of life suffers adversely, socially mobile residents people will leave communities and new residents will be deterred from settling. The result will be dispersed aging communities on lower incomes resulting in significant financial and resource impacts for all health and education agencies.

04 – IMPLEMENTATION- objection

This is not effective and not specific enough.

The monitoring and implementation process needs to include consultation of made neighbourhood plan areas in the setting of targets and means of delivery based on those specific plan policies and objectives.

It is an opportunity to design in a role for Parish Councils to be included as part of monitoring and implementation processes, not simply to be consulted prior to planning applications

05 - Duty to Cooperate objection

6) Impact of bordering strategic employment land developments

The statement does not go far enough and must include reference to co-operation specifically regarding the impact of intensive industrial poultry farming business across Councils and districts, including the Breckland and South Norfolk. The industry has such a significant impact on the area and is equivalent in scale and intensity to a regional major infrastructure project.

07 - Affordable Housing support and comment

Policy background and explanation

“07.08 For **Mid Suffolk** the overall profile of affordable housing appropriate to meet the population over the plan period derived from Local Housing Need is: 12.7% of housing to be Affordable Rented and 10.0% affordable home ownership (of which 5.8% could be Shared Ownership and 4.2% Starter Homes demand rather than requirement^[13]) reflects the mix of housing that would best address the needs of the local population. But this does not take into account the funding that will be available to help provide subsidised housing, and government policy on the level of funding fluctuates with the national spending review process.”

The plan needs to clarify the difference between social rented tenure and sub market affordable rent at up to 80% of market rent. The former is urgently needed in a low income area. The plan needs to set out the social rent requirement and how it will be delivered since it is of all tenures the most susceptible to variation agreements.

Policy SP02 – Affordable Housing

Stradbroke Parish Council strongly endorses paragraphs 7.10 and 7.11. Where it is reasonably foreseeable that applicants will be required to provide exceptional infrastructure or that abnormal development costs may arise, those indicative costs need to be provided at outline submission stage. The plan needs to include a requirement to review costs at detailed stage to avoid either stalled sites or developers avoiding contributions through last minute discovery of significant “abnormal” costs eg the Needham Quarry scheme.(piling- this was known about at an early stage but costs were not submitted until late in the planning process) and Chilton Leys (utility costs – foreseeable at an early stage but again submitted late).

The Plan needs to set out any alternative means of funding for affordable housing other than s106 as Homes England is quite clear they will not fund s106 in general. Specific means of funding social housing need to be clarified and encouraged in order to stop the decline of 3 and 4 bed social rented housing of which there is desperate shortage.

In cases where a made Neighbourhood Plan is in place the Parish should be consulted on any variation agreements proposed by the developer at the earliest possible stage so that detailed comment can be made on their request. Variation proposals must be justified by proportionate evidence and not accepted without justification.

09 - Spatial Distribution objection to point 9.10

Policy SP04 - Housing Spatial Distribution

“09.10 Whilst a new settlement approach has been discounted in this Plan (due to long lead in and delivery times), the Councils are mindful to give consideration to the longer term prospect of planning for a new settlement at the Plan review (due to be undertaken within 5 years of this Plan adoption). “

This aspiration is untenable in view of the intensive industrial poultry farming proposals and development. It can only work on an urban fringe and not on farming land due to land value changes wrought by this new industry.

The intensive industrial poultry farming industry proposals represent a land value tipping point. The above ground value capture from planning a new settlement in open countryside will be negligible in 5 years' time, unless the growth of intensive industrial poultry farming is strictly controlled, and even now it may be too late. This is because unless the industry is strictly controlled, greenfield land values will now rise to reflect brownfield development land values due to the realistic prospect of future development for poultry broiler farming.

MSDC must decide in this plan what its priorities are. Intensive industrial poultry farming and settlement growth cannot easily work together financially. MSDC needs to revise the plan and make its position clear.

The garden village aspiration must either be removed now or be planned for now. If housing is not prioritised over intensive industrial poultry farming, a garden village will not be deliverable in 5 years' time without huge public subsidy. Since the land value uplift is entirely foreseeable it would be poor policy making and possibly unlawful to plan for and support policies that what would foreseeably contribute to a deficit funding requirement in 5 years' time.

It must also carefully review evidence for primary school pupil yield. The current metric is flawed and out of date (see Table 4 below) and this has been scrutinised recently in the Suffolk Coastal Plan examination.

Table 4 – Minimum housing requirement for NP Areas

Stradbroke Parish Council supports the 282 home requirement for Stradbroke. However Stradbroke Parish Council would refer to the comments in the plan from SCC education regarding primary school capacity in Stradbroke.

This comment is based on an outdated metric contained in a SCC Education Topic paper 4 written in 2014 that predicates 0.25 primary school pupils per dwelling. This has been superseded by several elements of national policy

- the revocation of S123 CIL regulations

- DFE papers (links below are to SCDC Plan evidence base)

H34	Securing Developer Contributions for Education	April 2019	Department of Education
H35	Education Provision in Garden Communities	April 2019	Department of Education

Additionally, a recent paper by Ian Flintoff sets out national trends and research and refers to the metric as a “blunt tool”. (copy attached).

Flintoff notes the experiences of Sir Thomas Hitcham primary school Framlingham and Red Lodge West Suffolk. These show the difficulties of calculating this matter properly. Stradbroke Parish Council is convinced that any figure higher than 282 this is “tomorrow’s world”. A very careful and detailed objectively funded survey (ie funded by the developer but commissioned by the Stradbroke Parish Council) would therefore be required to provide the evidence necessary to justify significant development growth above and beyond this figure.

Stradbroke Parish Council are therefore cautious of the SCC statement that there is “additional capacity” since the made plan is specifically written to encourage higher yield development from 282 homes than the SCC 0.25 pupils per dwelling Stradbroke Parish Council would be concerned that significant levels of growth above and beyond the current allocation figure could stretch the existing school capacity beyond its current limits as happened at Red Lodge.

Furthermore the village is at the centre of the current intensive industrial poultry farming problems. That industry is a significant constraint to development. A new school would only be justified by a growth quantum of a scale and impact that would not keep pace with the infrastructure needs of the village – re-provision of the school, land and construction costs, electricity upgrade, roads upgrade and foul waste – that make this an unviable proposition financially.

The evidence for the village infrastructure constraints and the justifications for the growth quantum of 282 homes is on the Stradbroke Neighbourhood Plan evidence base. Stradbroke Neighbourhood Plan and documents can be viewed at: <https://www.stradbrokepc.org/neighbourhood-plan-documents>

Economic Policy SP05 – Employment Land **objection**

Economic Growth

There is a significant omission from the Economic policy and strategy that risks making the plan unsound

The Lichfield study notes the importance of agriculture to MSDC economy; however it also notes the growth of agritech and the significant potential for exploring the opportunities provided by that industry.

As the benefits of agritech are intrinsically linked to the plan objectives it is a surprising omission, especially since National Guidance was provided in 2013:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/227259/9643-BIS-UK_Agri_Tech_Strategy_Accessible.pdf

Land values are significantly lower than Cambridge and the working environment arguably much better. Stradbroke Parish Council would expect the Plan to prioritise this over mass meat production as an economic growth area, which in itself is not recognised.

The Eye Airfield site is a key site that could promote both energy as it now does, and agritech. These are synergistic industries and yet the plan fails to give any direction or vision on this important area of business. This goes to the separate Stradbroke Parish Council comments on the Plan Sustainability Appraisal and failure to consider reasonable alternatives.

Policy SP08 – Infrastructure Provision **object and recommend change**

Planning applications will be expected to include appropriate infrastructure provision. The delivery of planned growth set out in the Joint Local Plan is dependent upon the availability of infrastructure to support it. When making planning decisions, regard will be given to a core list of infrastructure constraints identified within the Councils' Infrastructure Delivery Plan and the associated Joint Local Plan evidence base. Applicants are required to mitigate the additional impacts their development will place on infrastructure.

Stradbroke Parish Council thinks the policy does not go far enough. The core list of infrastructure primarily refers to residential and not commercial/industrial objectives. It does not overtly reflect the polluter pays principle nor does it adequately reflect national policy, and this must be strengthened. Central Government Policy is set out in the Policy statement on Environmental Principles update 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/766299/env-bill-information-paper.pdf

The support for protected habitat sites mitigation zones is welcomed but Stradbroke Parish Council refers to its comments on the Sustainability Appraisal and the comments of Yaxley Parish council on the transportation issues through the village and the risk of escalation when lorries use the village from feeder businesses close to the protected sites along the A143.

Stradbroke Parish Council suggest the following amendment: that the Plan adopts the 4 principles set out in the Environmental Principles Paper of 2018. Stradbroke Parish Council suggest emphasis on the procedural environmental principles.

This is to guard against any recurrence of the lack of scrutiny around the Cranswick Eye Airfield planning application ref DC/17/05666. This did not receive proper scrutiny due to procedural manoeuvring. The chronology of this proposal is set out in the appendix to the Stradbroke Parish Council Sustainability Appraisal submission appendix 5 (copy attached).

The A140 must be included in to the plan alongside the A12 and A14, without this there will be undefined contributions requirements in and around the road. If the impact is not defined and contributions unspecified this can lead to severe impact contra NPPF Para 109.

Likewise the policy needs to draw attention to the requirements of national policy before seeking mitigation, and that means evidencing the development will not create an unacceptable impact on highway safety. In a region with limited footpaths and narrow secondary roads the bar for this test must be high.

All schemes must provide not just a travel plan but a transport assessment and these need to be detailed and reflect cumulative impact NPPF para 111 in order to avoid a repeat of the situation at Eye Airfield. (Attached screen shots from Crashmap UK highlight accidents in the area over 20 years)

Equal or Added weight should be given to parish intelligence as to developer consultants' professional opinions to avoid perverse or unworkable development outcomes. Eg in Stradbroke one consented site outside the NP (former Mark Peacock garage Planning Ref: DC/17/06203) has inadequate pedestrian access to the village but was consented for development. This is now causing problems, as residents are seeking ways to access the village over private land. Further, the transport consultant report made inaccurate statements about a visibility sightline and that led to withdrawal of a valid Highway objection.

Policy SP09 - Cross-boundary mitigation of effects on Protected Habitats Sites - objection

The drafted policy does not include the impact of economic development and the policy needs amending to include this omission along the “polluter pays” lines noted in comments for infrastructure.

Pollution can include noise and emissions. The policy must therefore specifically refer to impacts from intensive industrial poultry farming development, prohibitions constraints and mitigation in order to be sound.

Policy SP10 - Climate Change objection

The Council will:

- a. Require all major developments to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes and visual impacts, and the risk of extreme winter and summer temperatures; overheating from rising temperatures;
- b. Require a sequential risk-based approach taking into account future-proofing measures for impacts of climate change;
- c. Encourage and support innovative and proactive approaches to design and opportunities to deliver decentralised energy systems powered by a renewable or low carbon source and associated infrastructure, including community-led initiatives;
- d. Encourage and support new development that reduces waste and uses existing resources.

The policy omits reference to intensive resource using and waste producing businesses and how these will be treated. Intensive industrial poultry farming requires an average of 174 litres per day per 1000 chickens at 21c at week 5: <https://www.fivetanimalhealth.com/management-articles/water-consumption-broilers>

Water

The factory can process 15000 broilers per hour x 24 hours = daily feed of 360,000 birds per day. 360,000 birds x week 3 of 5 average consumption at 96 litres per 1000 will require 34.500 litres of water per day.

The average daily consumption of an adult in a 2 person household is 138 litres per day.

This is an equivalent daily use of 250 people or the equivalent of 125 homes when the annual housing target for the whole of MSDC is 556 homes.

Is this sustainable and what is the tipping point?

Waste

Poultry litter is very bulky. (67 cubic feet per ton)

A 20,000-bird broiler house will produce approximately 150 tons of litter per year

20,000,000 broilers produce 150,000 tons of litter per annum or 152,407,036 kg /10,000,000 cubic feet / 283,200 cubic metres of waste per annum.

This is 283,200 cubic metres which is the equivalent of covering over 17 football pitches 120 m long and 45 m wide to a depth of 3 metres or 1700 pitches to a depth of 3 cm., or 918 ha of land. That is nearly half of the Heveningham Hall estate.

However, DEFRA requires a maximum spread of 250 kg per hectare per annum thus making the spread capability 609,600 ha:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/355571/Manure_Factsheet.pdf

Suffolk is 3800 sq km which is 380000 ha therefore the factories provide enough litter to cover the whole county 1.7 times Anything not spread is waste.

How will this waste be disposed of in a nitrate vulnerable zone?

Local Policies

LP21 - Change in Land Use for Equestrian or other animal/rural land base uses **object**

A question is raised as to whether this is a strategic policy rather than a local policy.

Neither statements 15.38 and 15.39 address the rising intensive industrial poultry farming issue and the policy is ineffective to protect the environment and preserve biodiversity. The focus on the viability of the farm business while essential is not the sole criterion of sustainable development. The inclusion of the negative injunction not to impose unreasonable restrictions on the business presupposes detailed understanding of what those are or might be. The Eye processing plant is a case in point in which the scheme could not have been made viable without the capacity to deliver to it 100,000,000 chickens and yet the scheme has not evidenced that it, and its satellite supply chain, can deliver the draft policy requirement

Policy LP21 – Change in Land use for Equestrian or Other Animal/Rural Land Base Uses

1. e The proposal must be able to include satisfactory scheme for disposal of waste (if appropriate);

LP31 - Managing Infrastructure Provision support

Stradbroke Parish Council strongly supports the following policy statement with qualification

1. All new development must be supported, and have access to, all necessary infrastructure. Planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet the necessary infrastructure requirements arising from the proposed development.

“All necessary infrastructure” includes the road network.

“Capacity” in this context to be effective needs to demonstrate it is about more than severe impact in accordance with NPPF S9 and Para 109 that emphasises safety. Stradbroke Parish Council’s previous comments refer.

The development transport assessment must include details of mitigation and cost and this needs to be provided at the start of the pre application process so that costs and impact are quantified and there is no later argument about unexpected infrastructure costs impacting on scheme viability.

Scheme capacity to deliver necessary infrastructure must be front loaded and embedded in application /submission documents.

LP32 - Health and Education Provision

Stradbroke Parish Council support the policy but notes the outdated policy document Topic Paper 4 s106 developer contributions and ask the more recent DFE documentation be added to the evidence base to support the Plan.

Securing Developer Contributions for Education	April 2019	Department of Education
Education Provision in Garden Communities	April 2019	Department of Education

LP33 - Developer Contributions and Planning Obligations support with amendment

The policy needs to reference removal of Regulation 123 CIL pooling restriction to emphasise that contributions are collected on as wide a base as possible.

The policy needs to cross reference the strategic policy to support it and ensure full contributions and mitigations are viable and deliverable from the inception of a proposed scheme and prior to validation.

LA099 – Allocation: Land at Eye Airfield, Eye **object**

The site has not been properly assessed and there has been a lack of due process in relation to the grant of planning for the poultry processing plant. This is detailed in correspondence of 19-25 September with MSDC DM team (see attached documents).

The EIA scoping for the site was withdrawn and the cumulative impact of the factory on the highway network was not considered. However the highway network was a material consideration in the called in application DC/19/01673.

Stradbroke Parish Council objects to the site and the use in terms of the lack of assessment of the impact on the Made Stradbroke Neighbourhood Plan as the majority of traffic for the airfield will need to pass along the evidenced pinch point in the plan and previously provided evidence that supports the capacity of the village to develop a substantial number of homes. This is at risk from the wider proposals that were and are integral to the factory at Eye. (The Plan and all supporting documents for the Stradbroke Neighbourhood Plan can be viewed at: <https://www.stradbrokepc.org/neighbourhood-plan-documents>)

To be clear Stradbroke Parish Council is NOT objecting in principle to the type of factory and use but to the lack of due process in appraising the site for this use and the lack of an EIA. We say this Local Plan process cannot retrospectively legitimise an illegitimate process.

The further point is that the airfield measured site is stated to be 63 ha, whereas the airfield site is considerably larger than this at 135 ha. The new factory was consented into the countryside without any reasoning given in the officer report and again the plan process should not simply regularise irregularities, the plan needs to scrutinise the policy in view of what has taken place historically and policies reviewed accordingly. This is because there is a risk of setting a precedent of encroachment into countryside without good reason and if that has already occurred the policy written retrospectively is weakened in effectiveness by the exception to the rule, retrofitting policy is not a sound basis of plan making.

Stradbroke Parish Council will also review all evidence at plan submission stage including the list of specific developments (as per list attached) which are directly related to the Eye airfield factory.

Allocation policies LA080-LA083 support with corrections

Stradbroke Parish Council supports these policies within the context of the made Stradbroke Neighbourhood Plan. The plan narrative for the supporting documentation does not match the policy sites. This needs to be corrected to be made sound. The WPS transport assessment needs to remodel the Stradbroke Neighbourhood Plan, alongside the existing Stradbroke Neighbourhood Plan AECOM transport assessment (https://docs.wixstatic.com/ugd/d48f8b_5fa2723183974bb5822e584d5d217db4.pdf).

The modelling needs to reflect a detailed analysis of the impact on the settlement of the traffic movement as noted in the Stradbroke Parish Council response to the Sustainability Appraisal. In this case it requires a reappraisal for a minimum of 19 chicken broiler sheds, disregarding the developers own calculations and instead using considerably uplifted calculations to model the impact on the village.

This is because there is a real problem with accurate transport modelling historically in planning matters in the village.

The Barley Brigg biodigester (planning ref PL\0279\15) traffic movement variance between the consultants projected waste removal and the actual tonnage is so large Stradbroke Parish Council will not be content with or rely on developer consultant figures for any developer proposed modelling to support EIA or planning application proposals (see email correspondence below). The evidence is on the FOI analysis of the movements in and out of that site (see email extracts attached).

The evidence shows the consultant stated waste was 15,500 tonnes less than the actual annual waste removal , and the average truck takes 16 tonnes. This is a vast difference.

Stradbroke Parish Council would also be wary of significant and additional development proposals over and above the proposed policy allocations in view of the school capacity issues raised in part 1 and associated evidence documents about pupil yield.

Finally, Stradbroke Parish Council would NOT support developer proposals to vary any proposals to the made Stradbroke Neighbourhood Plan policy sites to any significant degree without first demonstrating the viability for that policy site is negative, and also how the developer assumptions fall outwith the general viability appraisal guidelines for typographical sites set out in the Aspinall Verdi whole plan viability appraisal.