

JOINT LOCAL PLAN

PREVIOUS RESPONSES BY STRADBROKE PARISH COUNCIL & AMENDMENTS MADE BY MSDC

The Parish Council submitted a full response to each section and can be viewed at: <https://www.stradbrokepc.org/planning-committee>, the response totalled 16 pages plus appendices. The table below lays out the **objections** the Parish Council made and beneath any changes to each section in the revised Local Plan.

At the end of the document are the policies that Stradbroke Parish Council supported – no comment is made on any changes that have been made.

The current version of the Plan can be viewed at; <https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/>

REF	SPC COMMENT/CHANGES	AMENDED?
03 Visions & Objs	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.	No
03	Economy: 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).	Yes
Changes	Point iii has been deleted.	
03	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	Yes

REF	SPC COMMENT/CHANGES	AMENDED?
	strengthened. This cannot be left to environmental permitting regulations; the plan must take a lead.as it is a strategic issue	
Changes	Point vi added: to reduce the drivers of climate change as much as possible from a social, economic and environmental perspective, with the ambition to be carbon neutral by 2030.	
03	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.	Yes
Changes	Point vii sentence added: and encouraging more sustainable travel Point ix updated to include all Towns in the areas not just Stowmarket and Sudbury.	
04	Implementation: 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	Yes
Changes	Point 04.04 added with reference to 3 appendices: 1. Housing Trajectory 2. Monitoring Framework 3. Schedule of Superseded Policies These can be found on pages 128 to 154	
05	Duty to co-operate 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.	Yes

REF	SPC COMMENT/CHANGES	AMENDED?
Changes	<p>The ISPA authorities have jointly commission transport modelling evidence with SCC. <i>Rest of section remains unchanged until final para</i> The ISPA authorities joint commissioned a settlement <i>rest remains unchanged</i></p>	
09 SP04	<p>Spatial Distribution Point 9.10: “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.</p> <p><i>Additional comments were made; full response can be viewed by following link above.</i></p>	No
09 SP05	<p>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. 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.</p>	Yes

REF	SPC COMMENT/CHANGES	AMENDED?
	<i>The full response and the response to the Sustainability Appraisal can be viewed by following link above.</i>	
Changes	Entire policy has been rewritten – including the following: 6) To ensure deliverable supply of employment sites to meet accommodate the changing needs of the economy, development or net additional employment uses along the strategic transport corridors (A12, A14 and A140) shall be supported in principle, subject to: a. The applicant demonstrates that any proposal is deliverable and would enhance provision which can not be accommodated on existing employment sties; b. All proposals demonstrate adequate highway capacity and access. There must be included sufficient off-road parking for the use on site to the satisfaction of the LPA; <i>Plus 4 other conditions.</i>	
11 SP08	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 <i>Additional comments were made; full response can be viewed by following link above.</i>	Yes
Changes	Policy has been completely rewritten – too large to be included in this document – see link above to MSDC website	
12 SP09	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	Yes
Changes	Policy has been completely rewritten – too large to be included in this document – see link above to MSDC website	
12 SP10	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 <i>Additional comments were made; full response can be viewed by following link above.</i>	Yes
Changes	Policy has been completely rewritten – too large to be included in this document – see link above to MSDC website Note: all mention of waste has been removed.	

REF	SPC COMMENT/CHANGES	AMENDED?
15 LP21 Note: now LP22	<p>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</p> <p><i>Additional comments were made; full response can be viewed by following link above.</i></p>	Yes
Changes	<p>The numbering of paras has changed ie 15.38 is now 15.37 Policy LP22 (was 21) Changes made to the policy are too large to include in this document but can be viewed by following the link above to MSDC Point 1 I. The proposal must not cause any adverse impacts to highways safety. <i>This point is repeated at 2 h.</i></p>	
	A new section LP24 – New Agricultural / Rural Buildings in the Countryside this includes a new policy Recommendation that all read this section as it is new and has not been evaluated before.	
18 LA099	<p>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.</p> <p><i>Additional comments were made; full response can be viewed by following link above.</i></p>	Yes
Changes	Policy has been rewritten acknowledging the Plan, Eye Neighbourhood Plan and Current Waste Safeguarding policies. Other changes are also included; in particular vii: Provision of a transport assessment to determine existing and projected capacity and any mitigation required....	

The following sections/policies were supported:

07 Affordable Housing

LP31 – Managing Infrastructure Provision

LP33 – Develop Contributions and Planning Obligations (amendments suggested)

Stradbroke 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.

No other areas were commented on.