

Email correspondence – LA099

RE: Cranswick chicken factory Eye DC/17/05666 - traffic movements and EIA and DC/19/02532 | Discharge of Conditions Application for DC/17/05666

Chris Edwards

Stradbroke Parish Council, 'Gemma Walker'; 'Guy McGregor'; 'Parish Meeting - Southolt'; Sue Ives; 'Matthew Hicks (Cllr)'; 'Toni Wisbey'; 'Julie Flatman (Cllr)'; R Berry; Philip Isbell

Dear Gemma

Thank you for pointing out this was considered at committee, I am now reviewing those documents and will revert once I have done so. An initial view of the transport report assumes a 150% uplift in traffic movements as a worst case for both light and HGV use. However even taking account of more efficient use of the hgvs, the question is whether the scale of the new factory capacity and the wider impact of that scale in terms of supply chain up and down stream was properly considered at any time using the existing factory production as a base line. There is a figure for hgv movements in and out of Weybred but no figures were provided.

Finally ,there is no reference to transport issues in your report from which I quote the following:

16.2 In the light of the benefits of delivering employment development on the site and the proposed mitigation which can be appropriately secured by way of condition **the proposal is not considered to have unacceptable impacts, with particular regards to design, layout, access, landscape, ecology, amenity and heritage assets**, such that the proposal is not considered to be acceptable.

It seems the impact of the supply chain on the substandard highway network surrounding the factory was simply not considered at any stage, neither whether the applicant's transport scaling assumptions were reliable, even though the CEO for Cranswick is quoted as stating

“Our facility at Weybread is at capacity so this will more than double the capacity for poultry production,”

<https://www.edp24.co.uk/business/cranswick-s-50m-factory-in-eye-suffolk-is-approved-1-5528654> 22 May 2018.

“More than double”. If we assume 100,000,000 chickens at Eye (300 days per year and 15,000 birds per hour) we can work back to 40 million chickens per annum through Weybred? So the metric should be 250% increase not 150% for traffic?

I simply do not believe the lorries presently arrive under supplied at Weybred as the report states, further there is no evidence in the report to support this statement. This higher metric of 250% is in my view much more probable. This view is based on the maths of this case and other examples of transport under assessments we have considered (FOI waste removal from Barley Birgg biodigester)..

The end figures for 2027 are buried in Appendices 10-12, they are not transparent and nor do I expect they were even considered but they look significantly larger. Where did anyone think 100,000,000 chickens (minimum) would come from? Or where the lorries would return to thereafter? Or the waste produced by the factory?

Kind regards

Chris Edwards

From: Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>

Sent: 25 September 2019 11:23

To: Chris Edwards

Cc: Guy McGregor; Parish - Stradbroke ; Parish Meeting - Southolt; Sue Ives; Matthew Hicks (Cllr); 'Toni Wisbey'; Julie Flatman (Cllr); 'r berry'; Parish Meeting - Southolt; Philip Isbell

Subject: RE: Cranswick chicken factory Eye DC/17/05666 - traffic movements and EIA and DC/19/02532 | Discharge of Conditions Application for DC/17/05666 - Condition 23 (Renewable Energy Technology).

Dear Chris

Please accept my apologies for the delay in getting back to you, I hope the following answers your queries in respect of both the EIA and sustainable energy condition.

In respect of the renewable energy condition DC/19/02532 this is in respect of a combined heat and power proposal in order to discharge the requirements of condition 23 to seek sustainable energy sources. This was refused and further information required. The CHP proposed was to use gas to generate power on site with the exhaust having a recovery system to recover otherwise wasted thermal energy.

A previous submission to discharge this requirement (DC/18/03796) was also refused, this was for a solar power scheme but was refused requiring further details as to whether this achieved the levels required by the condition.

We would expect further submissions to be made to discharge this condition in order to agree the details as required and are seeking relevant information. However, I would note that this condition solely relates to the integration of renewable energy technology to provide 10% of the predicted energy requirement of the development, often provided by solar panels, or other provision of renewable energy/low carbon measures.

With regards to the location of the site as countryside this was stated in the committee report that the location as set out in the Position Statement is outside the definition of the Eye Airfield site. It is however shown in Map 7 of the position statement as, in part, an area for development. Both this and relevant local plan policies were considered in the committee report, including policy E10, which sets a principle for allowing new industrial and commercial development in the countryside.

The planning application was not granted under delegated authority but was considered by Planning Committee in April 2018.

As mentioned by Bron there was a screening opinion undertaken on the Cranswick development. As you note the applicants submitted a scoping opinion request as the proposal falls within Schedule 2, something that is clearly stated in both the screening opinion and committee report. However, Schedule 2 development does not automatically require an EIA application, but should be considered with regards to whether it is likely to give rise to significant environmental effects, as was undertaken in the screening opinion.

With regards to transport effects SCC Highways did request a transport assessment as part of the scoping request consultation. This in itself does not result in the development being EIA development, if this is something that can be considered as part of a planning application. A Transport Assessment was submitted with the application on 22nd November 2017. SCC Highways and Travel Planning were subsequent consultees to the planning application and provided comments on the application, including the Transport Assessment, and requested conditions.

With regards to emails in respect of the screening/scoping process, the email from Dylan is one email and unfortunately does not provide the background to any previous discussions or emails in respect of the process undertaken in considering both the screening and scoping requests submitted. However, having regards to the EIA process it would be appropriate to undertake a screening opinion initially before proceeding with any scoping request. Having considered the screening opinion request, and if we have then concluded that EIA is not required, we would then need to contact the applicant and request the withdrawal of the scoping opinion.

I hope that this is helpful and answers your questions, however if there is anything further that I can help with please do not hesitate to contact me.

Regards
Gemma

Gemma Walker BSc (Hons), MA, MRTPI
Area Planning Manager
Development Management – Sustainable Communities

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From: Chris Edwards

Sent: 19 September 2019 14:15

To: 'Bron Curtis' ; 'Gemma Walker'

Cc: 'Guy McGregor' 'Parish - Stradbroke' ; 'Parish Meeting - Southolt'; Sue Ives ; 'Matthew Hicks (Cllr)'; 'Toni Wisbey'; 'Julie Flatman (Cllr)'; 'r berry'; 'Jill Erben'

Subject: RE: Cranwick chicken factory Eye DC/17/05666 - traffic movements and EIA

Dear Gemma

The applicant submitted a scoping request registered as MS/0332/17 on the basis, as he himself noted, that the site falls into the definition of schedule 2 development. The applicant subsequently sought a screening opinion by letter 16th March 2017 setting out reasons for screening out the site instead.

Screening opinion decision MS/1082/17 issued 28th March 2017 but agreed on the 23rd March determined a scoping was not required

The transport impact of this factory was entirely foreseeable at the time of the original screening request in January. For the record the factory processing capacity when fully operational is 15,000 chickens per hour, every hour, for potentially 365 days a year, or 131,000,000 chickens in and out annually as noted by their equipment supplier Marel, see website below

<https://marel.com/customer-stories/15000-bph-greenfield-plant-offers-cranswick-new-opportunities/>

The 1.2 million chickens noted by several sources including the applicant is thus simply phase 1. Neither figure takes account of the requirement for daily waste removal and disposal.

SCC Highways required a transport assessment for the applicant's original January scoping ref MS/0332/17. However this was never provided. Following the March request for a screening determination the applicant was invited to withdraw his original scoping request by Dylan Jones in his email of 23 March 2017 (see below).

This invitation was not based on any form of evidence other than the applicant's own request that the Council consider a scoping was not required. The applicants reasons do not address the issues set out in schedule 3 , set out below the email from Dylan Jones.

The transport issues raised by SCC Highways in January were thus not considered. The whole point of an EIA is to look at the wider issues, and this was never done. The potential impact of the development was wholly foreseeable given the known nature of the business, its expansion plans and its proposed relocation .

The email from Dylan Jones does not inspire any confidence that a robust independent planning view had been formulated about the EIA process and content and this is a matter of concern in view of where we now find ourselves. As this matter will impact detrimentally on thousands of peoples daily lives this is only a starting point but this will foreseeably become a highly charged and significant issue for the MSDC Local Plan process and examination

Kind regards

Chris Edwards

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From: Dylan Jones <Dylan.Jones@babberghmidsuffolk.gov.uk>
Date: Thursday, 23 March 2017 at 09:57 **To:** Ian Trundle <ian@trundle.com>
Subject: Scopining opinion reference number 0332/17

Hi Ian. I have just done the screening opinion that Mark Bassett from Freeths sent to me and I have just come to the conclusion that the Crown Chicken proposal at Eye Airfield does not require an Environmental Statement. So therefore, can I please ask if you could reply to this e-mail and just tell me that you would like to withdraw your scooping opinion as its not needed anymore.

Thanks.

Dylan Jones
Consultant Senior Development Management Officer
Babergh and Mid Suffolk District Councils – Working Together
(Please note I work Mondays to Thursdays only)
w: <http://babberghmidsuffolk.gov.uk/>

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Town and Country Planning Environmental Impact Assessment Regulations 2011
SCHEDULE 3

Selection criteria for screening Schedule 2 development

Characteristics of development

1. The characteristics of development must be considered having regard, in particular, to—
 - (a) **the size of the development;**
 - (b) **the cumulation with other development;**
 - (c) the use of natural resources;
 - (d) **the production of waste;**
 - (e) **pollution and nuisances;**
 - (f) the risk of accidents, having regard in particular to substances or technologies used.

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From: Bron Curtis <Bron.Curtis@babberghmidsuffolk.gov.uk>
Sent: 19 September 2019 09:50
To: Chris Edwards ; Gemma Walker **Cc:** Guy McGregor; Parish - Stradbroke <StradbrokePC@outlook.com>; Parish Meeting - Southolt Sue Ives; Matthew Hicks (Cllr) 'Toni Wisbey' ; Julie Flatman (Cllr) 'r berry'

Subject: RE: Cranwick chicken factory Eye DC/17/05666 - traffic movements and EIA

Dear Chris, thank you for your email.

I have copied Gemma Walker into this reply as she was the case officer for application DC/17/05666 and so is better placed to respond to your concerns relating to traffic.

I can however see that the application was screened for EIA under our ref 1082/17 and you can view the related documents on our website.

Kind regards,
Bron

Bron Curtis BA(Hons), MA, MRTPI

Principal Planning Officer, Strategic Projects and Delivery - Development Management **** Wednesdays and Thursdays only ****

Sustainable Communities

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From: Chris Edwards

Sent: 16 September 2019 16:58

To: Bron Curtis

Cc: Guy McGregor; Parish - Stradbroke; Parish Meeting - Southolt; Sue Ives; Matthew Hicks (Cllr); 'Toni Wisbey'; Julie Flatman (Cllr); 'r berry'

Subject: Cranwick chicken factory Eye DC/17/05666 - traffic movements and EIA

Importance: High

Dear Bron,

I recently attended a "We are listening " event hosted by SCC at Eye Town Hall. I spoke with Cllr Hicks about the concerns for this business. I now have reason to be further concerned about this matter as a consequence of the website below.

1. Traffic

<https://marel.com/customer-stories/15000-bph-greenfield-plant-offers-cranwick-new-opportunities/>

Cranwick: 1.2 million birds per week and 750 jobs

Marel Poultry: 15,000 birds per hour and 400 jobs. Assuming 200 production days per annum that is 108,000,000 birds per annum. However this is a conservative estimate due to the innovative hatching system being developed for the poultry factories, see my bold emphasis words for the extract below

<http://www.poultrynews.co.uk/production/hatching/analysis-crown-chicken-trials-on-farm-hatching-in-uk-first.html>

"It's a big project. **Phase one** will do about 1.2 million a week. So, we're in the process of building these numbers up ready for D Day. It's an exciting time."

DC/17/05666 set out the basis for transport movements to and from the proposed development and these show the commitment to using the A140 entirely for heavy traffic movement p 13/14 of the attached refers:

4.3 Traffic Distribution

4.3.1 In order to quantify the impact of the above traffic on the nearby highway junctions, it is necessary to distribute the traffic onto the highway. The existing distribution of traffic is considered to be a good starting point upon which to distribute any future development traffic. Thus, the following distribution principles have been applied to development traffic;

HGV Traffic

- Enters/exits via the existing access formed with Castleton Way
- Traffic arrives/departs towards A140, via Casterton Way
- Departures turn left/right onto A140 in proportion to existing left/right turning movements onto A140
- Arrivals turn onto Castleton Way, from the A140 in proportion with the existing turning movements from the A140 onto Castleton Way.

Since this was a basis for granting permission applications are required to follow this commitment and this means that any HGV traffic will be required not to route through Eye in order to approach or leave the new factory.

2. EIA

It also exceeds the threshold for Schedule 2 development and I cannot see an attached EIA or any reference to scoping for the project, and if this process was not followed the decision to grant permission is suspect as it appears to breach legal requirements which state the permission should not be granted until such an assessment has been carried out. If it has not been carried out the factory is in fact unlawfully permitted.

Perhaps you can reassure me on this point in view of the Local Plan re consultation and future Plan Examination? Or refer it to someone else to respond on this point? I may have overlooked the document.

Returning to the transport assessment I quote para 8.38 and 8.39 and can only wonder that nobody questioned the proposed traffic movements at the time or wondered where they were coming from or going to. The whole point of an EIA is to flush out these issues and their cumulative impact

8.38. The assessment looks at traffic flows up to 2027 and identifies that the worst case scenario is a total of 780 light vehicle movements and 308 heavy vehicle movements over a 24-hour period (both in and out of the site). At AM peak hours of 08.00-09.00 the survey identifies 53 vehicles (33 light and 20 heavy vehicle movements) and 121 vehicle movements in the PM peak hour of 16.00-17.00 (113 light and 8 heavy vehicle movements). 8.39. The assessment takes the traffic flow figures and identifies that both proposed site accesses will operate within capacity. The site access to the A140 would operate with a large degree of reserve capacity and the access with Castleton Way will continue to operate well within capacity.

Thank you

Kind regards

Chris Edwards
Chair Stradbroke PC planning committee