

8th May, 2008

Mr P Isbell
Professional Lead Officer
Planning Services
Environment and Planning
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk IP6 8DL

Dear Mr Isbell

Planning Applications 1077/08 – Two Sisters Food Group, Haughley Park, Haughley New Street – Erection of 14760m² of extension to existing factory, ancillary parking and ground modelling works

1. The Suffolk Preservation Society (the Society) are pleased to be able to submit the following representations aimed at assisting the LPA in its determination of the above application. It would ask they are conveyed in their entirety to Members of the appropriate committee for consideration.

The Countryside

2. The proposal relates to a site which, despite the existing factory, is still classified as being in the open countryside. Government policy on the countryside is set out in Planning Policy Statements PPS7. PPS7 “*Sustainable Development in Rural Areas*” sets out several key principles which should underpin land-use planning, relevant extracts being:-

“the Government’s overall aim is to protect the countryside for the sake of its intrinsic character and beauty”.

and

“(i) Decisions on development proposals should be based on sustainable development principles, ensuring an integrated approach to the consideration of:-

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- effective protection and enhancement of the environment:

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also

(vi) All development in rural areas should be well designed and inclusive, in keeping and scale with its location and sensitive to the character of the countryside and local distinctiveness”

In relation to specific policy advice on the countryside the PPS states:-

“Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced.”

3. The applicant’s Design and Access Statement (DAS) appear to ignore the countryside aspect of the proposal and by implication, fails to deal with the consequences. There is no automatic assumption that this site, given its location, should be developed beyond its current size. To do so, would, the Society suggests, have a profound adverse impact on the countryside and communities in the general vicinity because of additional uncontrollable traffic movements, noise, and light pollution.

Sustainability

4. The Government is committed to delivering sustainable development. The Society questions whether, given the nature and remoteness of the site/location, it is a sustainable one for the further development proposed. This appears not to be addressed in the DAS and the Society suggests it should be before the application is determined.

Setting of Listed Building

5. Haughley Park and barn are listed, the former - grade I. The LPA has a duty to consider the implications of the development on the setting of the listed buildings and parkland. The setting of the house is significant and would take in the application area. Has it been advertised accordingly?

6 In the Society's view this aspect has not been addressed in the DAS. Without a detailed and comprehensive appraisal of the site, in terms of its architectural and historic significance and importance, it is difficult to see how the impact of the proposal can be properly quantified. Until such an assessment is available the Society suggests that the LPA are not in a position to make an informed decision on the proposal.

7. There is no evidence to substantiate the applicant's claim in the final paragraph on page three of the DAS when it states:

“Without the significant investment and ongoing contribution by the applicant the future of the site including the park and house would be in some doubt”.

Such a statement appears totally untrue. The LPA and Members should not be persuaded to approve this proposal on the basis of such a statement.

8. While the ground works attempt to 'hide' the development this cannot and does not address its adverse impacts on the setting of the listed buildings and parkland. Far greater thought and attention to this aspect and consequences of the proposal is needed.

Light Pollution

9. Light pollution, which already exists, is now a statutory nuisance. It is essential this proposal does not add to this problem and the opportunity should be taken to reduce or eliminate it. It is unclear from the application and DAS what steps, if any, the applicants are taking to address this issue/problem.

Noise

10. Noise generated from the operations on a development of this magnitude will have a major impact on the quietness and tranquillity of the area. This will be compounded by traffic noise which will be significant. While such noise levels might be acceptable in urban situations they are not normally acceptable in the countryside. What actions are the developers taking to reduce noise? What will be the increase above existing background noise levels if this development were to proceed? What is the developer doing to minimise the increase in noise from the site?

Impact of Traffic Generation

11. The developments will generate significant traffic movements. The site is in the open countryside and immediate access and egress to and from it is via a country lane some of which pass through local villages. This cannot be controlled.

12. Traffic has a profound adverse impact on local communities and the lives of those who live in them. They suffer the consequences of developments of this type. While the applicant details improvements to access due to the works at Haughley Bends, there will still be no direct access from the site to the A14 if the proposal were to proceed. This, given the immense scale of the operation and possible future expansion, is surprising. The Society would suggest such an access needs to be explored and the applicant's assessment of the impact of their proposal on the local rural road network needs checking by an independent expert assessor.

Possible Future Extension and other uses

13. The Society suggests that the current business might now have outgrown this site given its location because of the fact that it adjoins a grade I listed building, its adverse impacts on the parkland and countryside, and the traffic problems. It would therefore ask that the LPA consider the implications of expansion of the site. It is already very large and this proposal is one of the largest ever submitted anywhere in the District. If it were to be approved, is there potential for future expansion, on a similar scale, as that is the likely consequences of a successful business operation on this site.

14. Another issue is what could happen on the site if the existing business were to cease. As stated, the site is already a large one and if this application were approved it would be one of the largest sites in the county. Clearly there would be a desire to find quickly a new occupier/business. But this would be likely to be very different in terms of the current one. There could be applications for changes of use and given the location of the site near the A14 it is not unforeseeable that these might be made for storage, warehouse and distribution type uses. Would the LA ultimately be happy to see such uses on this site? In order to deal with this potential but serious issue the Society would suggest that the LPA consider if it is minded to grant permission, to limit the use of the site and buildings and ensure that any change of use would be one that requires prior approval.

Conclusions

15. If the many issues and problems listed in this letter cannot be addressed comprehensively then the Society is of the view that the further expansion of this site is undesirable and will have greater disadvantages than advantages and benefits and should therefore be refused.

16. The Society appreciates that the LPA will feel obliged to approve this proposal because of the offer of additional employment that might be created. However there are substantial and significant issues to be addressed before any approval might be given if the environment and communities in the area are to be properly protected from the adverse impacts of the proposal. It is not, it suggests, in a form to be approved at the present time.

Yours sincerely

Richard Ward DipTP MRTPI
Director
Cc Robert Williams
Cc John Ette, English Heritage
Cc Haughley Parish Council
Cc Clare and Douglas Evans
Cc Sir Michael Lord MP