

6 September 2011

Mr Philip Ridley
Head of Planning Services
Waveney District Council
Town Hall
High Street
Lowestoft
Suffolk
NR32 1HS

For the attention of Mr Richard Amor, Planning Officer

Dear Mr Ridley

**Planning application ref DC/11/0670/FUL – Land at former Ellough Airfield,
Copland Way, Worlingham – Proposed Anaerobic Digestion Plant**

1. I am writing on behalf of the Suffolk Preservation Society ('the Society') regarding the above planning application. The Society is grateful for your consultation in this matter and wishes to submit the following representations.

Principle

2. The Society is supportive of anaerobic digestion (AD) as a means of processing waste and break crops to produce energy and extract value. However, the Society does not support the diversion of food production into AD as a wasteful use of a scarce resource. However, it is acknowledged that break crops can be helpful in maintaining soil structure and preventing soil 'mining' by extracting mineral trace elements through overly intensive arable production.

3. In the opinion of the Society AD plants comprising large scale above ground structures should be located as close as possible to the points of arising to minimise feedstock miles. In the case of farm derived material, locations within existing farmstead complexes are considered acceptable or alternatively within brownfield sites able to employ the heat generated by any CHP elements. It is not accepted that isolated greenfield sites are appropriate locations for AD as this essentially represents industrial development in the open countryside; lacking any essential justification for

a rural location. Indeed, this approach of rural restraint has formed the basis of the English planning system throughout the post war period.

4. It is for this reason that Policy WCS10 of the Adopted Suffolk Waste Core Strategy (2011) (as the most comparable local planning policy) permits AD within or adjacent to redundant agricultural or forestry complexes but not upon greenfield sites in the open countryside. The development of AD plants in the open countryside would be contrary to national policy in PPS4: Planning for Sustainable Economic Growth. Policy EC6, PPS4 restates the national presumption against such development in the open countryside at EC6.1 and EC6.2:

“EC6.1 Local Planning Authorities should ensure that the countryside is protected for the sake of its intrinsic character and beauty, the diversity of its landscapes...and to ensure that it may be enjoyed by all.

EC6.2 In rural areas local planning authorities should:

a. **strictly control economic development in the open countryside** away from existing settlements, or **outside areas allocated for development in development plans.**”

The proposal

5. The proposal represents the erection of an industrial complex of substantial scale unrelated to the needs of agriculture or forestry on the holding. No justification exists for a rural location and previously developed land would be sequentially preferable. The scale of structures proposed is very substantial and would appear alien and intrusive in the open arable landscape. It appears that the only justification advanced in support of this location is one of ownership. This cannot be seen as a valid planning reason for accepting such a potentially visually intrusive siting that would be materially harmful to the rural amenities of the wider area. Copland Way to the west of the site is an important landscape feature intended to define the eastern limit of industrial development on the former Beccles airfield. It is for this reason that a bund was created on the east side of Copland Way to perform as a structural landscape buffer. The current proposal would effectively undermine this established approach to development on the former airfield and create an intrusive incursion into this open arable landscape.

5. The proposed development is sited on the north portion of an arable field in open countryside. The land parcel does not form part of a larger contiguous holding in the vicinity. The greenfield nature of the site and its location outside any appropriate allocation in the development framework. In the opinion of the Society the proposals are clearly contrary to national policy in PPS4 and relevant policies in the Adopted Core Strategy and allied Development Management Policies. **As a clear departure from local and national planning policy, the application would need to be**

advertised as a departure in the unlikely event that the Council decided to grant permission contrary to these established policies.

Adopted Waveney Core Strategy and Development Management Policies

6. In the opinion of the Society the scheme runs counter to the strategic aims of the LDF Core Strategy and allied Development Management policies. Core Strategy objective 14 seeks to give priority to previously developed land. This site is clearly greenfield and thus contrary to this aim. Furthermore, the development is also contrary to Objective 17 that seeks to conserve and enhance the natural environment. Core Strategy Policy CS07:Employment seeks to give preference to previously developed land and in this case no overriding justification has been advanced for this greenfield site; effectively divorced from points of feedstock arising. Core Strategy Policy CS16 also requires proposals to conserve and contribute towards landscape character and retain tranquillity. The proposal would clearly run counter to these strategic aims.

7. In addition the following adopted Development Management policies are considered to be of direct relevance to the proposals:

DM01 – Physical Limits: Gives preference to previously developed land (PDL);

DM02 – Design Principles: Requires development to contribute to distinctiveness of the local area and the surrounding landscape;

DM03 – Low Carbon and Renewable Energy: states that schemes will be permitted where there are no significant effects upon the landscape;

DM27 – Protection of Landscape Character: states that proposals that have an adverse impact will not be permitted unless it can be demonstrated that they cannot be located on alternative sites that would cause less harm.

8. In the opinion of the Society the scheme is clearly and demonstrably contrary to these adopted Development Management Policies insofar as:

- the proposals do not give priority to PDL (DM01);

- the proposals would erode the distinctiveness of the local area and surrounding landscape (DM02);

- the proposals would significantly harm the landscape (DM03);

- the proposals would have an adverse impact and it has not been demonstrated that they cannot be located on alternative sites that would cause less harm (DM27).

Conclusions

9. As the above representations unequivocally demonstrate, the proposed AD plant in the greenfield location proposed would be contrary to relevant national and local planning policies and thus logic dictates the application should be refused for these

sound planning reasons. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that planning applications should be determined in conformity with relevant adopted policies unless material considerations indicate otherwise. In this case there are no material considerations to justify the setting aside of these adopted national and local policies. Accordingly, in the opinion of the Society, the Council should refuse consent for these reasons.

10. The Society as the countywide amenity group representing many thousands of individuals and hundreds of parishes across Suffolk requests that these representations are not paraphrased but reproduced in full as part of your officer's report to assist your elected members in their consideration of the application.

11. We would be grateful to receive timely notification of the relevant committee at which the application will be considered. The Society may wish to speak at the committee.

Yours sincerely



Simon Cairns

BSc (Hons) Dip TP Dip Bldg Cons (RICS) IHBC MRTPI

Director

CC: Waveney DC Ward Member, SPS Waveney District Secretary, Members of Waveney Development Control Committee, Worlingham PC