

27 September 2011

Mr Philip Isbell  
Lead Planning Officer  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Suffolk  
IP6 8DL

For the Attention of Bronwen Curtis, Senior Planner

Dear Mr Isbell

**Planing Application reference: 1609/11 - Change of use of agricultural land to use for B8 haulage, erection of MOT and maintenance workshop/office building, construction of roadways and parking areas. - Land adj to Fibropower, Potash Lane, Eye**

1. I am writing on behalf of the Suffolk Preservation Society ('the Society') to register our strong objections to the above proposed change of use. The application site is a greenfield site (not PDL) and is currently in arable production. It is located outside the existing or allocated areas of the former Eye Airfield Industrial Estate. There remain significant areas of former airfield hardstandings that could be allocated for such uses without resort to encroachment into greenfield land in open countryside.

2. The proposed use runs counter to local and national planning policies that seek to ensure that the countryside is protected for its own intrinsic merits in PPS7 and PPS4. PPS7 states at 1.(iv) Key Principles that "*New building development in open countryside away from existing settlements or outside areas allocated for development in development plans, should be strictly controlled; the Government's overall aim is to protect the countryside for the sake of its intrinsic character and beauty...*" Whilst at (v) PPS7 reaffirms that "*Priority should be given to the re-use of previously developed ('brownfield' sites) in preference to greenfield sites, except in cases where there are no brownfield sites available.*" Clearly this is not the case in this instance.

3. The national theme of countryside restraint is continued in PPS4 and PPS1. Policy EC6.1 of PPS4: Planning for Sustainable Economic Growth reiterates that "*Local Planning Authorities should ensure that the countryside is protected for its own intrinsic character.*" whilst EC6.2 confirms that "*In rural areas local planning authorities should "a. strictly control economic development in open countryside away from existing settlements, or outside areas allocated for development in development plans."*

PPS1 Delivering Sustainable Development gives priority to the development of previously developed land, at paragraphs 21, and 27 viii. Paragraph 27viii requires that "*Planning should seek actively to bring vacant and underused previously developed land and buildings back to beneficial use to achieve the targets the Government has set for development on previously developed land.*" PPS4: Planning for Sustainable Economic Growth states in policy EC2.1 d. that previously developed land should be

*'prioritised'* for development. The RSS that has yet to be revoked at Policy SS2 also requires planning authorities to prioritise *'the re-use of previously developed land in and around urban areas to the fullest extent possible'*.

4. Mid Suffolk Local Plan Policy also does not permit new industrial and commercial development on undesignated land that falls to be considered as 'open countryside' for policy purposes. This approach is continued in the adopted MSDC Core Strategy at Policy CS2 that restricts development in the open countryside to defined categories that do not include industrial uses are currently proposed. National policy in PPS, regional policy in the adopted RSS and the adopted Local Plan read together comprise the development plan against which decisions must be made in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that *"where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise..."*

5. In this case the policy framework is clear. Such industrial development should take place on an allocated site and priority should also be given to locating development on existing previously developed land. Within the wider former airfield There are a number of areas of concrete hardstandings (former runways and thus PDL) more than large enough to accommodate this development. These areas should be the priority for development in this locality and greenfield sites are clearly unsustainable development as they would result in the loss of valuable arable land. This crucial issue has perhaps unsurprisingly not been addressed in the application. In the opinion of the Society the thrust of national and local planning policies are all in strict conformity and seek to ensure that industrial development takes place on allocated sites and that PDL is sequentially preferable to Greenfield locations whilst development in the open countryside remains fundamentally contrary to local and national planning policies.

6. In conclusion, in the opinion of the Society the planning policy position is clear on this issue and there are no material considerations to justify the setting aside of these adopted policies and thus planning permission should be refused. The Council is reminded that the NPPF consultation draft has no statutory weight and, in any event, the proposal does not constitute sustainable development, involving the unjustified loss of valuable arable land.

Yours sincerely



Simon Cairns  
BSc(Hons) Dip TP Dip Bldg Cons (RICS) IHBC MRTPI  
Director

**CC: Thrandeston, Yaxley, Brome & Oakley PC's, Eye TC, MSDC Local Members Palgrave & Eye Ward, Mid Suffolk Committee SPS**