

15 March 2010

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

For the attention of Bronwen Curtis

Dear Mr Isbell,

**Planning application reference: 0096/10 - Former Airfield, Eye
Erection of 3 No. 130 metre high wind turbines and associated
infrastructure**

1. I am writing on behalf of the Suffolk Preservation Society ('the society') in response to the above planning application for the erection of 3 No. wind turbines of 130 metres in height, together with the relevant associated infrastructure. These comments have been formulated after careful consideration and analysis of the submitted application together with supporting documents.

Renewable Energy and Energy Conservation: The Society's position

2. There is an absence of regional and local strategic guidance on renewable energy generation and decisions are taken on an ad-hoc basis. In addition there are few, if any, indications of a coordinated approach between energy demand, energy generation and energy conservation and the whole issue of sustainability. The Society has a policy to ensure that all development in the county is sustainable and compatible with its special character. The Society supports the incorporation of measures to both reduce energy consumption and to conserve energy. It is considered that to conserve energy is likely to have a lesser impact upon the character and appearance of the county than the provision of stand alone renewable energy generation.

3. To that end, the Society believes that new or additional renewable energy generation proposals should be located to minimise impact upon the environment. The Society considers that proposals that are within or are adjacent to Areas of Outstanding Natural Beauty (AONB) Special Landscape Areas (SLA), The Suffolk Coast and Heaths Project Area, Dedham Vale and Stour Valley Project Area, and Suffolk River Valleys Environmentally Sensitive Areas or other similar important designations will not be considered acceptable.

4. In the Society's opinion, proposals in, on or adjacent to Listed Buildings, Conservation Areas, Historic Parks and Gardens and in Scheduled and non-scheduled Ancient Monuments will not be considered acceptable where the setting would be harmed or the character compromised. This includes proposals which border on or impact upon views from and to conservation areas and historic parks and gardens. In our opinion this approach is in conformity with the statutory protection afforded to these heritage assets. Proposals involving wind turbines exceeding 95 metres in height and within 2 kilometres of residential properties (in excess of 10 houses); will not normally be considered acceptable on amenity grounds. In conclusion, the Society will object to proposals which are not considered environmentally sustainable on energy grounds or would have a significantly harmful impact on residential amenity, landscape character or designated heritage assets.

The Planning Policy framework

Relevant National Policy

5. Government Policy, having regard to the nature and location of the proposal, is set out at Planning Policy Statements PPS1 Delivering Sustainable Development, PPS7 Sustainable development in rural areas and PPS22 Renewable energy, along with its companion guide.

PPS1 reiterates the Governments four aims for sustainable development which include the protection of the environment (para.4). The PPS states at para.5 that "*Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:*

- *making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;*

- *contributing to sustainable economic development;*
- *protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities:*
- *ensuring high quality development through good and inclusive design and the efficient use of resources and,*
- *ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.”*

6. Paragraph 17 reiterates that *“The Government is committed to protecting and enhancing the quality of the natural and historic environment in both rural and urban areas. Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole.”* Paragraph 18 states that Planning has a positive role and should *“seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality through positive policies on issues such as design, conservation...”*

Paragraph 36 states that a key objective should be to ensure that developments respond to their local context and create or reinforce local distinctiveness.

7. PPS7 “Sustainable Development in Rural Areas” reiterates several key principles which should under-pin land-use planning, relevant extracts being:

Para.1(i) Decisions on development proposals should be based on sustainable development principles, ensuring an integrated approach to the consideration of:...effective protection and enhancement of the environment...”

and

Para.1(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:

Para.15 “Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced.”

The application – Quantifying the impact

8. Wind farms, by their nature and scale, have an impact far beyond the immediate application area and this is acknowledged by the applicants in their Environmental Statement (ES) accompanying the planning application which states:

“The open nature and its position on a local highpoint increases the site’s visibility” (page 52). Whilst the application is not subject to any specific landscape designation, it immediately adjoins a Special Landscape Area (Mellis) and will therefore impact upon it. It is important therefore, that the policies of PPS7 and other planning policies are applied not only to the immediate application site, but also to the area of impact.

9. The limited zone of influence examined within the ES clearly illustrates the weight of historic assets that are within very close proximity of the application site. The area immediately surrounding the application site is distinctive by virtue of the concentration of heritage assets. It includes 8 grade I listed buildings and 33 grade II* listed buildings within 5km of the site, and 165 grade II listed buildings within 2km of the site, together with 8 conservation areas and 4 Scheduled Ancient Monuments. This concentration of heritage will be harmed by the scale and prominence of this development within the elevated, exposed and highly visible site.

10. With regard to the national policy set out above within PPS1 and PPS7 this proposal cannot be considered to be in keeping with its location. Neither can it be said to be sensitive to the character of the countryside and local distinctiveness; by reason of its monumental scale and industrial character. This proposal will not, as required, protect or enhance the character of the countryside. It fails all the requirements and tests of PPS7 and is, accordingly, contrary to national policy for rural areas and the countryside and should therefore be refused.

11. PPS 22 “Renewable Energy “sets out key principles including:

Para.1(iii) “At the local level, planning authorities should set out the criteria that will be applied in assessing applications for planning permission for renewable energy projects.”

And

Para. 11 “In sites with national recognised designations (...Areas of Outstanding Natural Beauty...Conservation Areas, Listed

Buildings,...Registered Parks and Gardens) planning permission for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which areas have been designated are clearly outweighed by the environmental, social and economic benefits.”

12. In relation to landscape and visual effects of renewable energy developments PPS 22: Renewable Energy states:

Para. 19 “The landscape and visual effects of particular renewable energy developments will vary on a case by case a according to the type of development, its location and the landscape setting of the proposed development...Proposed developments should be assessed using objective descriptive material and analysis wherever possible even though the final decision on the visual and landscape effects will be, to some extent, one made by professional judgement”

and

Para.20 “Of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects. However, in assessing planning applications, local authorities should recognise that the impact of turbines on the landscape will vary according to size and number of turbines and the type of landscape involved...”

13. Planning for Renewable Energy a Companion Guide emphasises the role of planning at a regional level to determine key decisions including targets and broad areas. In particular, that *“broad areas should be identified at the regional or sub regional level where development of particular types of renewable energy may be considered appropriate”*. The guide confirms that *“Renewable Energy policy should cascade from spatial strategy level to local level and that “appropriate tools may include ...geographic information systems (GUIS), landscape character assessment and landscape sensitivity studies”* At paragraph 3.10 the guide advises that *“for some technologies detailed regionally specific work may be required. For on-shore wind, a constraints geographic information system (GIS) may be needed and a landscape sensitivity study....”*

14. The guide emphasises the strategic role of the RSS in the development of a policy framework against which detailed criteria should be elaborated upon in Local Development documents. At paragraph 3.16 it states that

“Policies in regional spatial strategies should be sufficiently detailed to provide a clear framework for the development of renewable energy in the region...” 3.17 *“Criteria based policies may relate to particular types of locality, or technology or scale of development...”*

15. The East of England Plan (2008) fails to provide the requisite criteria-based policy framework at the regional level for the assessment of proposals for renewable energy. Furthermore, at the present time the Mid Suffolk LDF is insufficiently advanced to provide the requisite *“criteria based policies that focus on key local issues, within the framework set out by national planning policy and the Regional Spatial Strategy”* as identified as a key issue in planning for renewable at the local level (para. 4.6 of the Companion Guide and reiterated at para. 4.7) Paragraph 4.11 of the Guide states that such policies should list the issues to be taken into consideration set against the specific elements of landscape character and their sensitivity to change together with specific references to the impacts on the amenities of the area.

Technical Suitability of the Site: The Wind resource

16. The potential wind resource at this site is unknown. The degree of wind shear present at the site (increase in speed of wind related to elevation above ground) relates to the surrounding environment and surrounding obstacles. As para.32 of the Companion Guide (PPS22) confirms the assessment of suitability requires historic meteorological data and information from site anemometers that normally are required on site for 12 months to determine site suitability. The mast should be as tall as the hub of the turbine. The Guide states *“often when the mast is erected it is not known either if the site is suitable for wind farming or which turbine type would be most suitable”*. The Developer has failed to provide this basic technological assessment of the suitability of the site and the application is therefore fundamentally flawed.

The proposed turbines measure 130metres in height with a rotor blade span of 103metres. These are the largest turbines currently in production, and will therefore have the greatest possible impact upon the landscape and the heritage assets contained within it.

17. Having regard to the principles set out above from PPS22 and its companion guide, this proposal will compromise the objectives of designation of the SLA, the setting of hundreds of listed buildings, the conservation areas of Eye, Hoxne, Hoxne Cross Street, Mellis,

Thrandeston and Scole whose character and appearance will fail to be preserved or enhanced, together with the setting of 4 Scheduled Ancient Monuments. The conclusion must be that this proposal does not meet the key principles in PPS22. It is, therefore, contrary to national policy which specifically sets out guidance for such developments and should be refused.

18. Planning Policy Guidance (PPG) 15, Planning and the Historic Environment and PPG16, Archaeology and Planning set out government guidance in relation to the heritage. In PPG15 at para.1.6 the government urges local authorities to maintain and strengthen their commitment to stewardship of the historic environment...".At para 2.1 the guidance confirms that *'the protection of the historic environment, whether individual listed buildings, conservation areas...or the wider historic landscape...will need to be taken fully into account both in the formulation of authorities', planning policies and in development control.*" The note reiterates the statutory protection afforded to listed buildings and their setting (para. 2.16) and in terms of setting, the note confirms at para. 2.17 that *"the setting of a building may be limited to obviously ancillary land, but may often include land some distance from it...a proposed high or bulky building may also affect the setting of a listed building some distance away, or alter views of a historic skyline."* With regard to conservation areas the note reiterates the statutory protection afforded to conservation areas together with their setting or views into or out of the area (para. 4.14).

19. PPG16 states at para.21 *"Where the developers own research indicate that important archaeological remains may exist, it is reasonable for the planning authority to request the prospective developer to arrange for an archaeological field evaluation to be carried out before any decision on the planning application is taken...the evaluations of this kind help to define the character and extent of the archaeological remains that exist in the area of a proposed development, and thus indicate the weight which ought to be attached to their preservation. They also provide information useful for identifying potential options for minimising or avoiding damage. On this basis, an informed and reasonable planning decision can be taken."*

Regional policy

20. The east of England Local Plan 2008 sets out the regional planning guidance. Policy ENV6 states:

“In their plans, policies, programmes and proposals local planning authorities and other agencies should identify, protect, conserve and where appropriate, enhance the historic environment of the region and landscapes including historic parks and gardens and those features and sites (and their settings) especially significant in the East of England:

ii) an exceptional network of historic market towns

iii) a cohesive hierarchy of smaller settlements ranging from nucleated villages, often marked by architecturally significant medieval parish churches, through to a pattern of dispersed isolated farms.

vi) conservation areas and listed buildings, including domestic, industrial and religious buildings and their settings and significant designated landscapes.

vii) the rural landscapes of the region which are highly distinctive and of ancient origin and

viii) the wide variety of archaeological monuments, sites and buried deposits which include many scheduled ancient monuments and other nationally important archaeological assets.

The proposal is clearly not in accordance with policy ENV6 of the East of England Regional Plan and should therefore, be refused.

Relevant Saved Local Plan Policies and Local Development Framework Core Policies

21. Mid Suffolk Local Plan (1998) Saved Policies HB1, HB8, HB13, HB14, CL2, CL3, CL24, E12,H16, GP1 and policies CS2 and CS5 LDF core policies are considered to be of direct relevance to the assessment of the application. In the Societies opinion, for the reasons set out in our representations, the proposals are not in conformity with the objectives of these policies in so far as the turbines would significantly:

- harm the landscape qualities for many kilometres around the site;
- would significantly adversely impact upon local residential amenity;

- would materially harm the setting of many listed buildings including those at the highest grades of national importance;
- potentially harm unidentified archaeological remains that could be of national significance in the absence of a field evaluation;

And finally:

- would harm the setting of adjacent conservation areas including Eye, Thrandeston, Mellis, Hoxne, Hoxne Cross Street and Scole

Impact on Historic Environment: Archaeology, Listed Buildings and Conservation Areas

22. The Companion Guide (PPS22) confirms the sensitivity of listed buildings and conservation areas to wind turbines. Para. 48 states:

“Special care will be needed if proposed sites for wind turbines should happen to be near listed buildings or conservation areas. PPG15 gives advice about the conservation aspects of planning control”.

English Heritage guidance “Wind Energy and the Historic Environment” (2005) identifies direct and in-direct impacts upon the historic environment. The direct impacts include the large foundation slabs and associated trenching for cable ducts which have *“the potential to damage any underlying archaeological remains”*. In this case the applicant’s submission confirms “moderate potential for there to be unknown Roman archaeology in the northern part of the PDA and a high potential in the southern part of the PDA.” In terms of Anglo-Saxon remains the applicant’s submission confirms “there is a high potential for as yet unknown Saxon archaeology to be present in the southern part of the PDA. In the northern part of the PDA the potential for Anglo-Saxon archaeology is thought to be low to moderate.” The report concludes at Para. 7.5 “the risk of direct damage to any archaeological remains that are present within the PDA at the site of the turbines and along the cable route **is considered to be high.**”

23. In light of national guidance set out at paras. 21 -22 of PPG16, in the absence of a field evaluation there is insufficient information concerning the nature and importance of the archaeological resource to allow an informed decision to be made and consequently planning permission should be refused on archaeological grounds alone.

24. The English Heritage guidance identifies indirect impact upon the heritage:

“Wind energy developments may impair the setting of historic sites and can compromise the visual amenity of the wider landscape, detracting from historic character, sense of place, tranquillity and remoteness. In certain conditions, indirect impacts can also include noise and shadow flicker from turbines...Turbines towers are now typically in excess of 60m in height and may have a zone of visual influence more than 10km in radius.”

25. In terms of the influence on listed buildings the applicants have restricted their search area in the case of the highest grades (I or II*) to only 5km and in the case of grade II buildings to only 2km. We find this narrowly defined search area unacceptable in so far as it presents a wholly misleading picture of the magnitude of the impact upon buildings within the statutory list. The discrimination between the search areas applied to the various categories is inconsistent with the statutory protection afforded by the 1990 Act. In our opinion, and based upon Government guidance set out at PPG15 above, the setting of a listed building should not be narrowly defined and the impact upon all listed buildings where there would be intervisibility should be assessed. To set an arbitrary limit of 2km on the setting of grade II listed buildings lacks any logical basis nor statutory justification.

26. The Society suggests that in order to assess the visual impact upon each listed building, a case by case study is required to discharge the statutory duty at S.66(1) of the 1990 Act. We consider the report grossly negligent in respect of its assessment of impact. Even with the applicants own meagre catchment, the impact on the highest grades of listed building is wholly unacceptable with no. 5 grade I churches, no. 3 grade I secular buildings and 33 grade II* dwellings within a 5km radius. Accepting that the unique character of each building will determine the exact nature of the impact, the impact upon the five medieval churches is particularly alarming given that these were intended to be the most significant built form in the landscape and designed to have a dominant presence on the skyline. The magnitude of the adverse impact upon the immediate setting of Yaxley parish church alone illustrates the unacceptable harm associated with the proposed development. Even within the 2km zone some 165 grade II buildings are identified, if the search is increased to 10km this number increases exponentially. We cannot surmise on what basis the applicant believes that “the impact of the proposed wind turbines on the setting of

listed buildings in nearly all cases is negligible.” In our own expert opinion this is clearly unfounded in fact or statute.

27. Even the applicants own evidence accepts that there are three instances where the impact upon the setting of grade I and II* listed buildings is material (Church of St. Peter and St. Paul, Eye , Eye Town Hall and the Motte and Bailey Castle, Eye). However, the Society believes that the impact will be significantly greater than “modest” as suggested. Furthermore, where the submission identifies a material impact upon the setting of five grade II listed buildings (Whitehouse Farm, Yaxley, Langton Grove and Rose Cottage, Langton Green and the Dovecote at Goswold Hall) the Society believes that the setting of these buildings will be irrevocably damaged due to their very close proximity and the titanic scale of the turbines. Whitehouse Farm, in particular will be profoundly harmed located less than 500m from the nearest turbine. We find it impossible to reconcile this with the submission that concludes “in all of these cases the impacts are considered to be minor”.

28. In terms of visual dominance, EH guidance (2005) highlights this as a key factor to be borne in mind when assessing the acceptability of development within the setting of historic sites:

“Visual dominance: wind turbines are far greater in vertical scale than most historic features. Where an historic feature (such as a hilltop monument or fortification, a church spire, or a plantation belonging to a designed landscape) is the most visually dominant feature in the surrounding landscape, adjacent construction of turbines may be inappropriate.” (please note the submission misquotes to suggest this would be “appropriate”!)

29. Similarly, in the opinion of the Society, the impact of the development on the setting of adjacent conservation areas is in some cases very significant, depending upon the intervisibility of the turbines to the conservation area in question. The submission casts its net only locally to cover a 5km radius and we believe that this fails to acknowledge the statutory position, Government nor English Heritage guidance. The submission identifies 8 conservation areas within the 5km radius but sadly trivialising the impact of the development based upon the presence of intervening trees and minimal distance. The report concludes that “the proposed development does not intrude or have any physical effect on these conservation areas.”

30. In our opinion this conclusion is not supported by even a superficial assessment of the intervisibility of the development and its contrast in scale and character with that of the conservation areas identified. In particular, the impact upon the skyline in views in to and out the areas would be profoundly harmed having regard to the subdued topographic setting and the resultant visual dominance of turbines of this scale. The report concludes at 5.4.2 “the airfield site includes...all are very visible from the surrounding area. The 5km ZVI...generally indicate that the development would in theory be visible from many locations from the study area”. As a consequence the proposed turbines would have a visual impact proportionate to their scale. The report acknowledges that “the 5km ZVI (fig. 5.5) shows the three turbines will be seen from 90% of the area within a 5km radius. This is not surprising as the area is fairly flat.”

31. In our opinion the turbines would have a significantly harmful impact on the character, and setting of the conservation areas identified and this impact would be proportionate to their intervisibility extending many km beyond the subjective 5km radius selected by the applicant. Usefully, in the recent Suffolk County Council Core Waste Strategy documents, the ZVI of a flue on the same site, but only 90m in height and lacking the rotor blades found on a turbine, is mapped by landscape consultants. This independent landscape assessment conservatively demonstrates the potential ZVI of an installation at Eye. It should be noted that due to the topography this exceeds 15km in radius and this confirmed by the EH 2005 guidance that notes “turbine towers are now typically in excess of 60m in height and may have a zone of visual influence more than 10km in radius.”

Landscape impact

32. Para. 5.4.2 and figure 5.5 within the submission indicates that “the three turbines will be seen from 90% of the area within a 5km radius. This is not surprising as the area is fairly flat.” We find the viewpoint analysis does not bear scrutiny and the conclusions are similarly unsupportable as they underplay the potential impact, for example, from Yaxley, viewpoint 2 “potential effects of the turbines is generally minimal as there are very few areas where the turbines can and will be seen as they will be generally concealed behind hedges and trees.” The Society believes this claim to be ridiculous. Similarly, the view east from Mellis Green is ascribed “low location sensitivity” despite its conservation area and SLA status resulting in viewpoint 5 achieving only “low sensitivity” and Thrandeston only

“moderate to low”. Nevertheless, in the case of viewpoint 3 (Victoria Hill, Eye) and viewpoint 15 (west of Occold) the high visual sensitivity and impact of the turbines is finally acknowledged.

33. We find the suggestion that a landscape mitigation fund of £10,000 in total reflects the applicant’s lamentably low regard for the importance of landscape and visual amenity. The reports conclusion is similarly superficial and unconcerned with landscape stewardship stating “most views towards the site are already cluttered with industrial buildings, chimneys and pylons the scale, however large an addition would be seen as improving the landscape of the immediate vicinity.” Given the acknowledgment in the companion guide (PPS22) of the need to consider cumulative impact, in our opinion the undeniable harm of these regrettable structures should not be compounded by the uncompromising industrial scale.

Proximity to neighbouring houses

34. The application site is immediately surrounded by residential properties: To the east, in Eye parish, to the north in Brome, to the west Yaxley village and Thrandeston and Braiseworth to the south. All of these parishes will be very significantly affected by visual intrusion and increased background noise levels. This will be most significant at night when background noise levels are at their most sensitive and resident’s quiet enjoyment of their homes at its most precious. Whilst at peak periods the A140 creates a localised noise corridor with enhanced background levels, the settlements adjacent to the A140 remain tranquil and retain a remote rural character. This will be fundamentally harmed by the increase in background noise levels due to aerodynamic modulation. Whilst the document states that “noise at night is not seen by ETSU-R-97 as critical as the ‘quiet’ daytime noise levels this is because between the hours of 20:00 and 07:00 residents are asleep and would not be affected by noise out of doors” and consequently “rather greater noise emissions may be seen as permissible at night”.

35. In our opinion the night-time hours are of equal or greater sensitivity to the busy daytime period when residents are engaged in daily activities. At night it reasonable expectation for quiet enjoyment of rural homes and the ability to sleep with open windows without alien noise intrusion. Whilst the applicants admit that shadow flicker is a potential threat and that a highly detailed study is required to measure the location and size of all

windows with potential to suffer from this problem (presumably because of the proximity of so many dwellings to the site). The suggestion that software will close down the turbines when appropriate highlights the fundamental conflict between the proposed development and the residential amenity of neighbouring dwellings.

36. The developer seeks in some way to mitigate this significant loss of residential amenity by the offer of a paltry community fund of £10,000 per annum. We believe this is an affront to the integrity of the surrounding communities and wholly inadequate to offset the loss of amenity and harm to the character of their rural environment. We believe that the applicants are aware of this harm and in relation to BS4142:1997 confirm “the site lies in a windy environment where the conditions stipulated by the standard will be difficult or impossible to satisfy when the turbines are generating electricity”.

Illumination

37. The report acknowledges the need to attach a warning beacon to the nacelle and that this will be either 10 or 25 candella variously within the document! At the Eye public meeting the developer stated that it would only shine vertically, and not horizontally. We fail to see how this could be effective for aviation to meet the concerns of the MOD and therefore the turbines would add further irritating light sources which would intrude into the night sky. The applicants confirm that this would be seen up to a distance of 4 miles from the site.

Biodiversity

38. The Society defers to the opinion of Natural England, The Suffolk Wildlife Trust together with the County Ecologist. However, we note the potentially significant impact upon protected species of birds and bats. In particular species protected by the Wildlife and Countryside Act 1981 including the Song Thrush and Fieldfare (Red List Suffolk County Council List of Conservation Concern) and Bullfinch (Amber List Suffolk County Council List of Conservation Concern). The applicants study reveals 8 species of bat including Natterers bat, which is subject to international protection.

39. The report fails to identify roosts, flight paths and feeding grounds within and adjacent to the site to allow the impact of the turbines on these protected species to be appropriately assessed. We believe that the report

fails to give adequate weight to the impact of the proposals upon biodiversity in accordance with the provisions of the NERC Act 2006. The suggestion within the report that post-construction monitoring for bats and birds to check for any risks to populations flies in the face of logic as the impact has occurred.

Conclusions

40. The Suffolk Preservation Society believes that there is an overwhelming weight of sound planning reasons based on statute, national, regional and local policy to reject these ill-conceived proposals. In accordance with the provisions of S.38(6) of the Planning and Compensation Act 2004 this harmful proposal should be refused in conformity with these established policies. As para. 11 of PPS22 states “*in sites with nationally recognised designations (...scheduled monuments, conservation areas, listed buildings etc) planning permission for renewable energy projects should only be granted where it can be demonstrated, that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits*”. As we have demonstrated this is clearly not the case in this instance and the LPA should therefore refuse planning permission.

41. We believe this outcome would accord with the aspirations of the local community surrounding the site as expressed by their respective parish councils, as their democratic representatives. This also reflects the responses given at the public exhibition on 2 December 2009, when only 5 out of 40 attendees stated that they were in favour of the development. The Society wishes to confirm that its full support and expertise will be forthcoming to the lpa in the event of a subsequent appeal against any refusal.

Yours sincerely

Simon Cairns
MRTPI IHBC
Director

CC: Eye Town Council, Brome & Oakley PC, Yaxley PC, Mellis PC, Thrandeston PC, Diss Town Council, Thornham PC, Hoxne PC

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