

16 June 2020

Iain Robertson  
Planning Officer  
East Suffolk District Council  
Riverside, 4 Canning Road  
Lowestoft, NR33 0EQ

Dear Mr Robertson

**DC/19/2195/FUL to build 3no. poultry house with associated admin block and feed bins  
Land adjacent to West End Farm Mill Lane, Shadingfield, Beccles, Suffolk NR34 8DL**

I write on behalf of the Suffolk Preservation Society (SPS) regarding the above application for the erection of three poultry units, administration block, control room with associated development at West End Farm, Shadingfield. The proposals have the potential to negatively impact upon the wider setting of Moat Farm a grade II\* listed building and a scheduled ancient monument which is included within the Heritage at Risk Register. Having reviewed the revised Heritage Impact Assessment, the comments made by the council's heritage advisor and the comments from Historic England, the SPS would like to make the following observations:

The HIA takes a predictably narrow view of setting and relies heavily upon intervisibility. Nevertheless, it is acknowledged by all parties that the site forms part of the setting of Moat Farm, a highly graded heritage asset. The site forms part of a very open landscape and can be seen from the footpath to the east of Moat Farm and this is supported by the LVIA submitted in support of the application. The property is currently in a very poor condition and the Society is concerned that to permit this scheme will further undermine securing a sustainable future for this important historic site.

The SPS considers that the proposals represent an unwelcome industrialisation of this deeply rural landscape by the introduction of large-scale structures measuring nearly 100m in length and 23m in width, 5m-8m in height together with bunding, external lighting and significant levels of HGV movements. It is acknowledged that adapting to the needs of farming has been a defining characteristic in the evolution of our countryside. However, the Society does not support the view that this application simply represents another chapter in the story of a working landscape. The proposal represents a fundamental shift to a semi-industrial character with significant changes to the character, scale and intensity of the land use. The SPS does not agree that such a change in character is comparable to previous episodes of agricultural practices in farming and husbandry and the scale of impacts is materially greater than any previous manmade interventions.

We concur with the views expressed by Historic England that permitting poultry sheds in this sensitive location will result in harm to the setting of Moat Farm. Cumulatively, the visual impact

of the sheds, feed bins, access road, lighting and bunds in combination with the increased noise, smell and HGV activity levels will materially erode the tranquility and character of the place, thereby negatively impacting upon the significance of Moat Farm. Furthermore, we note that the subsequent mitigation proposals of a 2m high bund wrapping around the southeastern corner of the site is testament to the harmful visual and noise impacts that will arise if this application is permitted. It is also noted that the council's landscape advisor considers that this approach will not be effective.

The tests for considering potential impacts on designated heritage assets are clearly set out at para. 193 which requires that great weight should be given to an asset's conservation and the more important the asset the greater the weight should be. At para.196 it states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use.

While the production of food is a public benefit, the SPS suggests that this change of use to poultry rearing is clearly not the only optimum viable use. The NPPG defines optimum viable use as *the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use.* On that basis the SPS considers that the harm to the setting of Moat Farm will materially prejudice its chances of restoration and therefore it does not outweigh the public benefits.

In summary, the SPS considers that the harm identified cannot be justified, contrary to para. 194, when it has not been demonstrated why it cannot be minimised by alternative site selection (a legal principle that has been clearly established by *Forge Field Society vs Sevenoaks District Council*).

We acknowledge that the countryside is a living landscape which is defined by its ability to adapt to changing patterns of agriculture. However, the setting of Moat Farm will be harmed by the industrialising proposals and whilst it is true that there are poultry farms across the county, it is also true that sensitive siting in the landscape is essential if we are to safeguard the qualities of our rural landscapes, especially when they are as fragile and precious as at Moat Farm. Accordingly, we object to the proposals in this location and urge that the application is refused.

I trust that you will find these comments helpful in the assessment of this case.

Yours sincerely,



**Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC**

**Director**

Ward Councillor

J de Grazia - SPS Waveney District

L Martin - Conservation Officer, ESC

Shadingfield, Sotterley, Willingham and Ellough Joint Parish Council