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Elizabeth Gibson-Harries,
Horham & Athelington Parish Council

Jill Erben,
Southolt Parish Meeting

Sue Ives,
Campaign Coordinator, Save Our Suffolk Countryside

By electronic mail

Dear Ms Gibson-Harries, Ms Erben and Ms Ives,

Intensive poultry unit developments in Mid Suffolk District

We refer to your joint letter submitted to both Councils dated 3rd September 2020 responding to our joint letter dated 3rd August 2020.

We are grateful for your understanding on why we felt it is necessary to review the UK poultry market. Your points relating to the industry are noted and, as set out in our letter, we are looking to establish a robust set of evidence. Your letter outlines some of the externalities of intensive farming. We would like to stress, again, that local councils do not control the character of the agriculture.

Before responding to the bullet points in the summary, there are some elements that require further clarification.

The categorisation of poultry rearing units is a matter for regulation and the terminology used, and the comparisons with other types of development do not alter the processes undertaken. For example, you refer to the Environmental Assessment Regulations. The 2017 regulations do indeed classify “intensive” rearing of poultry with more than 85,000 places for broilers or 60,000 places for hens within schedule 1, therefore automatically requiring the submission of an Environmental Statement with a planning application. However, the requirement to undertake the environmental assessment process does not then mean that such development is unacceptable.

Emissions from traffic, whilst important to reduce, are not a reason to resist any development. Instead, the answers are to move to alternative sources of energy, which is primarily a matter for national policy, and reduce the distances involved in production, which is a matter for local government to promote.

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As noted in our previous letter, the agglomeration of firms does promote reduced mileage and emissions. The alternative, a position resistant to growth which you are advancing would, all things being equal, increase emissions through greater distances.

We do not agree with your assertion that both authorities are “intent on prioritising economic objectives *over and above* environmental and social objects”. It is clear that national planning policy attaches significant weight to the need to support economic growth and productivity. The reference you make to the Herford appeal case, whilst for broilers, are not directly transferable to all such proposals. Each planning case is determined on its merits. If evidence identifies that proposals will detract from landscape character or result in the deterioration of highway safety, for example, they are unlikely to be supported.

Provide further details of the Poultry Panel, including whether or not the remit has changed, who the members now are and what the outcomes of the recent meeting(s) have been.

The “Poultry Panel” comprises Local Government officers from a range of disciplines, including Economic Development, Development Control, Planning Policy and Highways, from both Suffolk County Council and Babergh & Mid Suffolk District Councils. Additional expertise will be brought in as required from Environment Agency or Environmental Health teams.

The Panel’s core purpose is to help us to share knowledge around poultry and other livestock businesses and this purpose has not changed since it was set up at the beginning of the year.

Meetings of this group were paused due to Covid-19. Ongoing restrictions from Covid as well as additional time pressures resulting from work relating to the pandemic mean that, whilst the panel has been reconvened, other work has taken a priority in the last six months. It is hoped that as the intensive work relating to Covid eases, additional resource will be allocated to the work of this panel.

Model the impact of the Cranswick meat processing factory and its network of intensive poultry units as a matter of urgency.

Whilst your letter requests for modelling impact of a specific factory, which already has planning permission, it is less specific about what type of modelling you are referring to such as a focus on economic, transport, environmental or other forms of modelling.

It is our view that a more effective approach is collecting evidence from a broad range of interactions in order to better understand the industry as a whole rather than limit this to one business which will assist an iterative appreciation of that sector in this area and its dynamic economic situation in the present climate.

This comment also appears to be related to your suggestion for a comprehensive strategic assessment which we address below. Both authorities are, because of issues you raised, developing the evidence to inform the HGV review.

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Bring forward the public consultation on the HGV Review initiative.

Engagement is not restricted to formal public consultation and, as noted above, the points you are raising are already being considered with a technical review of the existing network. This is the first of two parts of the review that is also looking at changes such as new retail/industrial areas, reported incidents and accidents and changes to the network to cover new road links, and changes in structural weight restrictions.

The second part is a community review to identify with local councils and residents particular locations and routes where HGVs may be causing problems. In response to the impact of Covid-19, the community review has been delayed until early 2021. This is likely to commence in February or March and will include the outcome of the technical review.

The community review will be in the form of an online questionnaire that will enable all parish and town councils to enter details of issues or concerns including the location of specific issues and any data that has been collected. This engagement will run for around three months to enable communities to gather evidence and discuss at local meetings ahead of submission.

The response to the community review will then be analysed with a view to identifying issues and a range of solutions that could be applied. A date for reporting the outcome of this work will be set once the scale of responses has been assessed.

Draft a policy for inclusion in the Joint Local Plan that recognises intensive poultry units as industrial development, with impacts as harmful as other large industries, providing guidance designed to direct intensive poultry units to appropriate locations to ensure that harmful impacts are fully mitigated.

Local Planning Policy must be formed within the regulatory and national policy contexts. Intensive poultry units are agriculture and rural locations are appropriate. Where planning permission is required, impacts are assessed and mitigated in line with these policies.

Our previous letter included comments on the current Planning Policy position for Babergh & Mid Suffolk District Councils.

Employ tighter scrutiny and ensure more rigorous appraisal to achieve greater transparency and full disclosure in planning applications for intensive poultry units.

Information is available to the public on planning applications submitted to both authorities through the public planning portals. This allows transparency and scrutiny from the public and other interested parties. The fact that you are highlighting concerns has resulted in greater awareness that both organisations are already considering in responding to and determining planning applications.

Planning officers already set out clear information requirements from applicants to ensure applications are assessed effectively, and greater knowledge of the sector will only help to inform this process.

The requirements for information to support applications must be measured and balanced to accord with national and local validation requirements. Applications are considered and reported upon transparently and proportionately case by case on the planning merits.

Appraise planning applications for intensive poultry units within the context of the cumulative and 'in combination' effect.

As an underlying consideration, it must be borne in mind that poultry production at whatever scale or intensity is agriculture for the purposes of planning and this does not of itself constitute "development" requiring planning permission under the statutory code. In the light of this, planning applications are being determined in accordance with current regulation, national and local policy. National policy, you will doubtless be aware, attaches weight to the importance to promote economic growth through the planning process and this is a material consideration. We are considering the cumulative element as far as is reasonable and proportionate to the planning circumstances and to go further, as noted above, requires a greater set of evidence and a change in national policy guidance.

Conduct a comprehensive strategic assessment and risk analysis, to quantify the externalities, especially with regard to the impact that the growth of intensive poultry units will have on the environment, on public health, on wellbeing and amenity of communities, on smaller scale poultry businesses, on tourism, on the landscape, on housing development, and on the desirability of Mid Suffolk as a place to live and work.

Your suggestion to undertake a "comprehensive strategic assessment and risk analysis" is an interesting concept, but the subsequent list of issues highlights how complex such an approach could be. For example, a comparison of displacement effects from growth in intensive poultry with positive and negative impacts to housing development. There are some potential tools, such as for Social Value and Natural Capital, that could assist, but the fundamental difficulty in modelling are the hypothesis and counterfactuals. An approach advancing restraint in one area would result in different impact to different areas because the activity would be displaced. However, we will investigate the potential for such an approach further.

We are responding to your concerns as quickly as possible but, as I am sure that you can appreciate, all services within our councils are focused on maintaining the best service possible during our response to a national pandemic.

Yours sincerely,



Arthur Charvonia
Chief Executive
Babergh Mid Suffolk District Councils



Nicola Beach
Chief Executive Officer
Suffolk County Council