

Re: planning application DC/21/02068 pig units

Wyverstone Parish Council discussed this application at an extraordinary planning meeting held on 27<sup>th</sup> April, and having received a number of comments from concerned residents, the members voted to object to this application on the following grounds:

1. The application is described as a 'replacement pig unit' but this is not strictly true since the proposed new buildings are outside the site to which the existing permit pertains. Therefore, technically this is a new application on greenfield arable land.
2. There are inaccuracies in the Environmental Health officer's odour report. The number of nearby properties in College Road, Earls Green who would be affected has been underestimated - a terrace of four cottages has been calculated as two and the two separate properties at Crosslands have been counted as only one. Home Farm Barn and the two new houses under construction have not been included at all. This effectively doubles the number of houses mentioned in the report from 6 to 12. This would therefore exceed the benchmark level of what is regarded as a nuisance. The owners of all the privately owned houses affected have expressed their concern to members of the parish council. The results in the report focusses on the average odour levels but fails to take into account the clearing of the pig litter which are highlighted as the peak emission times. Consequently, the impact is probably under reported in terms of how many properties will be affected and to what extent. When the unit operated previously, the peak times were certainly a problem.

The EH officer's response (no objection) was based on the logic that the new unit would be less bad than the "existing" unit. As the site in question has not been used for pigs for over eight years, this comparison is invalid. The suggestion that the current, disused unit could be brought back into use under the current permit is questionable. Certain work which was required for the original permit in 2007 was never undertaken and in any case, the buildings are now dilapidated and in a very poor state of repair.

We would suggest therefore, that this application be considered on its own merits rather than in comparison to the "existing" unit which it is not currently operating and is unlikely to be in future.

The application is presented as a replacement for the existing pig unit. We would suggest that any approval contains a condition that the existing buildings be demolished before construction of the new buildings begins.

3. The Design and Access statement suggests that the proposed operation will create a negligible increase in HGV traffic but again this has been compared to an operation which doesn't exist. There is already huge concern locally about the volume of HGV traffic currently generated by the other commercial businesses which operate from Red House Farm (mainly Portable Space container storage) and the parish council has received complaints from residents about damage to property caused by lorries using inappropriate routes. Instead of using the main farm entrance in Rectory Road, Bacton, these lorries regularly use College Road and other access points in Wyverstone and Great Ashfield. These emerge onto single track lanes with very few passing places and are totally unsuitable for HGV traffic. Any increase in such traffic will exacerbate the damage already caused to the road surface and verges. The application states that access to Jacksons Farm will be via the Red House Farm access in Rectory Road, Bacton. If the application is approved, we would suggest that an enforceable condition is included that this is the *only* entrance/exit to be used.

-

**From:** Tina Newell

**Sent:** 18 May 2021 11:12

**Subject:** Re: Planning consultation response - DC/21/02068

Good morning

An upload was made onto your planning site offering the Parish Councils SUPPORT for this application sometime around 27 04 21.

Best wishes

Tina

Tina Newell  
Parish Clerk Bacton

# Comments for Planning Application DC/21/02068

## Application Summary

Application Number: DC/21/02068

Address: Livestock Unit Red House Farm West Of College Road Wyverstone (Part In The Parish Of Bacton) Suffolk

Proposal: Planning Application. Erection of a replacement livestock unit with associated infrastructure.

Case Officer: Mahsa Kavyani

## Customer Details

Name: Mrs Carol White

Address: Meadow Farm, Elmswell Road, Great Ashfield Bury St Edmunds, Suffolk IP31 3HQ

## Comment Details

Commenter Type: Parish Clerk

Stance: Customer objects to the Planning Application

Comment Reasons:

- Affects Local Ecology/Wildlife
- Application is lacking information
- Design
- Drainage
- Health & Safety
- Inadequate Access
- Increase in Pollution
- Increased Traffic/Highways Issues
- Noise
- Potentially Contaminated Land
- Residential Amenity
- Smells - Odour

Comment: GREAT ASHFIELD PARISH COUNCIL COMMENTS ON:

DC/21/02068 - Planning Application for Erection of Replacement Livestock Unit with associated infrastructure at Red House Farm Bacton Pigs Ltd, Rectory Road Bacton, IP14 4LE.

At a meeting of Great Ashfield Parish Council on Thursday, 22nd April 2021, this application was considered and discussed in detail.

The Parish Council unanimously objected to this application on the following grounds:

### 1. Access

The Design & Access Statement states that the new facility will use the "existing access" to Red House Farm. Appendix 1 (Location Plan) shows the red line access point to be Rectory Road, Bacton. In practice current HGV traffic movements from the Red House Farm site frequently use

'other' access routes via totally inadequate single track roads through Great Ashfield, ie Wetherden Road, Daisy Green & School Road, and without enforceable restrictions the adverse impact on residential amenity, damage to the road surface, destruction of grass verges etc along these routes will only worsen. It should be noted that many properties along these routes are sited very close to the road and passing HGV traffic causing damage to property is a very real concern for residents.

Note that this formalising of access to the location plan must also apply to the applicant's contingency plan of refurbishing existing units.

## 2. Volume of Traffic

The Design & Access Statement is misleading in its representation of HGV traffic movements, quoting an overall average of less than 6 per week, in practice the quoted figures indicate that in week 13 there will be a concentration of HGV's of at least 16, 16.5m HGVs per week.

The Statement indicates that these traffic movements are negligible in relation to the current level of traffic movements from the Red House Farm site, however, there is already considerable concern at the size and volume of traffic exiting Red House Farm via completely unsuitable routes, causing considerable damage and loss of amenity (verges, potholes, drains etc.) to local residents. These other commercial businesses operating from Red House Farm have expanded considerably since the existing permit mentioned in the Design & Access Statement was granted in 2007, in particular the expansion of Portable Space. This business rather than exiting Red House Farm via Rectory Road is regularly using the roads in Great Ashfield to access and exit the site, often early in the morning and later in the evening when there are restrictions on the use of other access routes. These single track roads through Great Ashfield are integral to the local village footpath network and the significant increase in both size and quantity of traffic on these supposedly quiet country roads leads to very real safety concerns for walkers, cyclists & horse riders. Any additional HGV traffic as a result of the new pig units will only exacerbate the already considerable problems in the area. As single track roads there are very few passing places, so when HGV's meet head-on there is an even bigger problem. Similarly, there is no mention of construction traffic associated with the demolition of existing units and the erection of the new units.

## 3. Site

The Design & Access Statement in its first paragraph refers to Jacksons Farm, an existing, but unused pig unit and suggests that the application is to demolish the existing buildings and replace with new. However, reading on through the Statement it is clear that the replacement buildings will be erected on greenfield / agricultural land adjacent to the existing units, and not on the existing footprint, resulting in a loss of productive agricultural land.

## 4. Design of Buildings

The design of the buildings proposed is considered inadequate and incompatible with higher animal welfare standards and the keeping of pigs indoors seems contrary to this aspiration. The means of muck removal from the sheds is to sweep/push it through from one end to the other and to then be deposited at one end. It will then be stored on concrete pads to be spread on adjoining land as manure at a later date. There is no mention for instance of a stockman's walkway to facilitate the inspection and/or removal of ill or injured pigs. There is considerable concern that the

higher welfare standards outlined will not therefore be attained.

The waste plan excludes any mention of fly/pest control. We concur with Environmental Health comments.

#### 5. Environmental Concerns

Although the proposal deals with the question of emissions of ammonia, methane and nitrogen associated with the keeping of pigs and the production of substantial amounts of manure, the modelling data provided suggests that the control measures proposed will only meet minimum acceptable requirements. It is indicated that the pig sheds will be ventilated via high velocity ridge mounted roof fans with dispersal of emissions to the atmosphere, without any further treatment. The adjacent land where the spreading of farmyard manure will take place is classed as "high risk" for water pollution.

The manure to be spread on the adjoining agricultural land will inevitably be contaminated with antibiotics and worming preparations generally used in the production of intensively farmed pigs, there are no proposals to mitigate the effects of this on the land, and the potential contamination of local water courses.

Notwithstanding environmental concerns associated with emissions from the pig units and waste products themselves, there is no mention of the associated environmental impact of carbon emissions as a direct result of the increase in HGV traffic on the surrounding residential areas.

In the light of the above, Great Ashfield Parish Council voted unanimously to recommend refusal of this planning application in its current form.

**From:** Christine Mason  
**Sent:** 18 May 2021 12:22  
**To:** BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>  
**Subject:** Re: Planning consultation response - DC/21/02068

Wetherden Parish Council have no objections to this planning application.

Christine Mason  
Wetherden Parish Clerk

Babergh District Council  
Development Control  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2021/126071/03-L01  
**Your ref:** DC/21/02068  
**Date:** 13 August 2021

Dear Sir/Madam

**ERECTION OF A REPLACEMENT LIVESTOCK UNIT WITH ASSOCIATED  
INFRASTRUCTURE RED HOUSE FARM BACTON PIGS LIMITED RECTORY  
ROAD BACTON IP14 4LE**

Thank you for re-consulting us on the above application. We have reviewed the newly submitted documents and can confirm that we are able to remove our objection. We have provided further information below.

**Environmental Permit**

The applicant has supplied all the outstanding information we asked for and this has resolved our outstanding concerns.

**Ammonia modelling**

Ammonia screening was carried out in 2019 based on the proposal to change the permitted number of animal places at Jacksons Farm to 6,650. Based on the information the applicant supplied they were not required to submit detailed modelling with an application. The applicant states that there are no material changes to the information supplied in 2019. I will therefore ask our permitting team to see if the screening is still valid, i.e. there are no additional habitats sites that may impact on the results.

**Odour modelling**

It is noted that the applicant has submitted a revised odour modelling report and this still concludes that the proposed new piggery will offer a significant reduction in moderately offensive odours at nearby residences, compared to the existing piggery, if it were in use. Although this is an improved situation we recommend that you consider if this is an acceptable situation under planning legislation. I would re-iterate our original comments in that the Environmental Permit for the farm only requires

odour and noise to be minimised by the use of Best Available Techniques (BAT). It does not require that there is no odour or noise outside of the boundary of the farm.

We trust the above is useful.

Yours faithfully

**Miss Natalie Kermath**  
**Planning Advisor**

Babergh District Council  
Development Control  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2021/126071/01-L01  
**Your ref:** DC/21/02068  
**Date:** 28 May 2021

Dear Sir/Madam

**ERECTION OF A REPLACEMENT LIVESTOCK UNIT WITH ASSOCIATED  
INFRASTRUCTURE RED HOUSE FARM BACTON PIGS LIMITED  
RECTORY ROAD BACTON IP14 4LE**

**Thank you for consulting us on the above application, we have reviewed the documents as submitted and can confirm that we are raising a holding objection due to a lack of information. We have provided further information on how the applicant can overcome our objection in the overcoming our objection section below.**

**Waste Management License**

This planning application relates to Jacksons and Scholes Farm Pig Unit which is regulated under Environmental Permit WP3637MD. Please note the original permit was varied on 20/06/2008. We would ask the applicant to check they are referring to the permitted pig numbers as detailed in WP3637MD/V002 and correct the figures they have used where necessary.

Under WP3637MD the following number of pigs were permitted in total between both Jacksons Farm and Scholes Farm;

	Production pigs	Sows	Piglets
Jacksons Farm and Scholes Farms (aggregated)	12,810	1,563	7,022

Under WP3637MD/V002 the aggregation was removed and the following number of pigs are permitted at Jacksons Farm and Scholes Farm;

	Production pigs	Sows	Piglets
Jacksons Farm	6418	750	4828
Scholes Farm	6442	813	2194

The proposal is to demolish 14 existing buildings at Jacksons Farm and replace them with 6 new buildings in order to accommodate 6,630 production pigs. It appears there are no plans to alter Scholes Farm and therefore it will continue to stand empty.

### **Overcoming our Objection**

The applicant should submit confirmation as to whether Scholes Farm will remain un-altered, or if Scholes Farm is to be altered with this planning application, the applicant should submit details of how Scholes Farm shall be altered.

The applicant will be required to submit an application to vary the permit if the proposal is granted. It is noted that the applicant sought advice from us in 2019 as to whether detailed ammonia modelling would be required should they submit an application to increase production pigs to 6,650 at Jacksons Farm. The applicant will need to resubmit this information to check that the screening still holds, this can be done by completing and submitting a pre-application form which can be found on our website;

<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

### **Further advice relating to the Environmental Permit**

#### **Odour modelling**

The applicant has carried out odour modelling which concludes that the predicted odour exposure from the current piggery will exceed the Environment Agency's benchmark for moderately offensive odours at 18 properties. The predicted odour exposure from the proposed new piggery will exceed our benchmark for moderately offensive odour at 6 properties, and these are marginal exceedances.

The modelling therefore concludes that the proposed piggery will offer a significant reduction in moderately offensive odours at nearby residences and although we note that the Environment Agency's benchmark figure will have been marginally exceeded at 6 properties, this must be recognised as an improvement on the existing piggery. It must however be noted that both Jacksons and Scholes Farm have stood empty for the last 7 years.

The odour modelling has been based on figure of 9,490 production pigs for the existing piggery. The applicant should advise where this figure has come from. It is our opinion that the modelling needs to be re-run based on the current permitted figure of 6,418 production pigs at Jacksons Farm. The odour modelling should also include the slurry lagoons at Scholes Farm as a potential odour source.

It must be noted that the Environmental Permit for the farm only requires odour and noise to be minimised by the use of Best Available Techniques (BAT). It does not require that there is no odour or noise outside of the boundary of the farm.

#### **Slurry**

The proposed new piggery will generate farmyard manure (FYM) which will be stored on concrete pads at the back of the buildings. Runoff from the FYM will be classed as slurry under The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010. It is proposed that the slurry will be pumped to the existing slurry lagoons at Scholes Farm for storage until it can spread to land.

All slurry stores and lagoons on permitted farms must meet BAT requirements and therefore must be covered by 21 February 2021.

We have previously allowed operators of permitted pig and poultry farms who can demonstrate that livestock slurry has a dry matter content of less than 1% to not cover their slurry lagoons. We have recently reviewed the evidence base for <1% dry matter position and its relationship with ammonia emissions and have found no evidence supporting its continued use. Therefore this position was withdrawn as of September 2020.

We have published a Regulatory Position Statement (RPS) which will allow an 18 month extension beyond the deadline of 21 February 2021 for operators who have been previously reliant on the <1% dry matter position to comply with the BAT requirements. The permit holder for WP3637MD has asked for this extension and therefore has until 21 August 2022 to cover their slurry lagoons in line with the BAT requirements.

If you are minded to approve this application despite our advice we request that you inform us beforehand so that we can provide further comment within 21 days.

We trust the above is useful.

Yours faithfully

**Miss Natalie Kermath**  
**Planning Advisor**

Direct e-mail [natalie.kermath@environment-agency.gov.uk](mailto:natalie.kermath@environment-agency.gov.uk)

Date: 30 April 2021  
Our ref: 349559  
Your ref: DC/21/02068



planningyellow@babberghmidsuffolk.gov.uk  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Mahsa Kavyani,

**Planning consultation:** Planning Application. Erection of a replacement livestock unit with associated infrastructure.

**Location:** Red House Farm Bacton Pigs Limited, Rectory Road, Bacton, Suffolk, IP14 4LE

Thank you for your consultation on the above dated 09 April 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE**

##### **NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

#### **Sites of Special Scientific Interest (SSSIs)**

The ammonia assessment identified the following Sites of Special Scientific Interest (SSSIs) within 10 km of the farm:

- The Gardens, Great Ash-field SSSI
- Stanton Woods SSSI
- Westhall Wood and Meadow SSSI
- Burgate Wood SSSI
- Gipping, Great Wood SSSI
- Combs Wood SSSI
- Norton Wood SSSI
- Pakenham Meadows SSSI

Based on the ammonia assessment and other plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which these sites have been notified and has no objection.

Natural England are keen to promote additional on-farm measures to reduce ammonia pollution. Please see Annex A.

### **Natural England review of air quality impacts**

Natural England is currently reviewing how we provide air quality advice on likely impacts. This could mean in future that thresholds and criteria could be changed based on evidence and recent case law.

### **Other advice**

#### **Net gain**

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. We draw your attention to Para 170, point d and Para 175, point d of the National Planning Policy Framework which states that:

Para 170: *"Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".*

Para 175: *"When determining planning applications, local planning authorities should apply the following principles:*

*d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity".*

Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to [Technical Note 2](#) of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into developments.

#### **Access and Recreation**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex B.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on 07768 237040

Yours faithfully,

Sam Kench  
Norfolk and Suffolk Team

## Annex A – Additional measures to avoid air pollution

Ammonia (NH<sub>3</sub>) is a key air pollutant that can have significant effects on both human health and the environment. Around 88% of ammonia emissions in the UK come from agriculture and the Government are keen to encourage widespread adoption of measures to reduce the levels.

**The Code of Good Agricultural Practice (COGAP) for reducing ammonia emissions** is a guidance document produced by Defra in collaboration with the farming industry. It includes advice on the practical steps farmers and contractors can take to minimise ammonia emissions from the storage and application of organic manures.

Copies of the Code are available at <https://www.gov.uk/government/publications/code-of-good-agricultural-practice-for-reducing-ammonia-emissions>.

With regard to spreading the **COGAP** document states:

*Nitrogen, in the form of ammonia, is lost from organic manures (such as slurry, solid manure and litter, digestate, sludge and compost) when they come into contact with air, particularly on warm or windy days. Nitrogen is also lost from manufactured fertilisers during spreading. The more that this occurs, the more nitrogen is lost as ammonia, meaning the material is a less effective fertiliser and loses value. Therefore, measures to reduce ammonia emissions and improve overall nutrient management practices could reduce the amount of manufactured fertiliser that farmers need.*

The document then goes on to give advice on a range of measures that can be taken to reduce ammonia emissions during the spreading manures:

### Spreading organic manures

- use a nutrient management plan and regularly test manure and soil to calculate suitable application rates and plan timing
- spread only the right amount, in the right place, at the right time
- spread in cool, windless and damp conditions
- spread slurry and digestate using low emission spreading equipment (trailing hose, trailing shoe or injection) rather than surface broadcast (splash plate)
- incorporate solid manure, separated fibre, cake or compost into the soil by plough, disc or tine as soon as possible and at least within 12 hours
- consider processing slurry or digestate, such as by acidification (with professional equipment and advice) or separation

Individual farm circumstances may well dictate which measures are appropriate and practical to implement. What the Code encourages is for farms to consider where savings can be made; starting with the management of livestock; through the storage of manures, slurry and digest; and onto the method and timing of spreading.

The section on poultry in the COGAP lists a number of sector specific mitigation measures:

### Poultry Housing

Poultry housing should be kept as dry as possible as poultry manure and litter emit more ammonia when wet. Consider these techniques for reducing ammonia emissions from your poultry housing, particularly when refurbishing or constructing new buildings:

Applicable to both layer and broiler housing:

- ventilate colony deep pit or channelled systems. This reduces the moisture content of the manure and litter
- regularly check building structure and water drinkers to reduce any leaks and keep litter dry. More ammonia will be emitted if the litter becomes wet and then dried
- use acid scrubbers or bio trickling filters to remove ammonia from exhaust air. A multistage scrubber is recommended because of the co-benefits in reducing ammonia and other

particulate emissions. These can include substantial amounts of phosphorus and other elements which can be recycled as plant nutrients

### Tree Planting

Natural England notes that tree planting forms part of the poultry units application. You may well be aware that tree planting is a further measure that can be taken to reduce the impacts of emissions by capturing a proportion of the ammonia leaving the housing. The '**shelterbelt**' would need to follow the up to date design guidance but evidence from trials estimates up to 27% of ammonia emissions from livestock houses and up to 19% from lagoons may be captured within the woodland. Information and guidance on the design of the planting can be found on the following site: <https://www.farmtreestoair.ceh.ac.uk/>.

As well as reducing the ammonia emissions planting of trees can bring wider environmental benefits.

## Annex B – Additional Advice

Natural England offers the following additional advice:

### Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

### Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#) Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. *Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.*

### Protected Species

Natural England has produced [standing advice](#)<sup>1</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

### Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)<sup>2</sup>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found

<sup>1</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>2</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

[here](#).

### **Ancient woodland, ancient and veteran trees**

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

### **Environmental enhancement**

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

### **Rights of Way, Access land, Coastal access and National Trails**

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer.

### **Biodiversity duty**

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

-----Original Message-----

From: East of England Region <e-east@HistoricEngland.org.uk>

Sent: 12 April 2021 14:18

To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/21/02068

Good afternoon,

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

Address: Red House Farm Bacton Pigs Limited, Rectory Road, Bacton, Suffolk IP14 4LE

Application: DC/21/02068

Thank you for your letter dated 9th April 2021 regarding the above application. On the basis of the information available to date, in our view you do not need to notify or consult us on this application under the relevant statutory provisions, details of which are attached.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

Yours sincerely

Patron Her Majesty The Queen

The British Horse Society

Email enquiry@bhs.org.uk

Abbey Park,

Website www.bhs.org.uk

Stareton,

Tel 02476 840500

Kenilworth,

Fax 02476 840501

Bringing Horses and People Together

Warwickshire CV8 2XZ



Mahsa Kavyani  
Babergh and Mid Suffolk District Councils  
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8 Russell Road  
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Via email

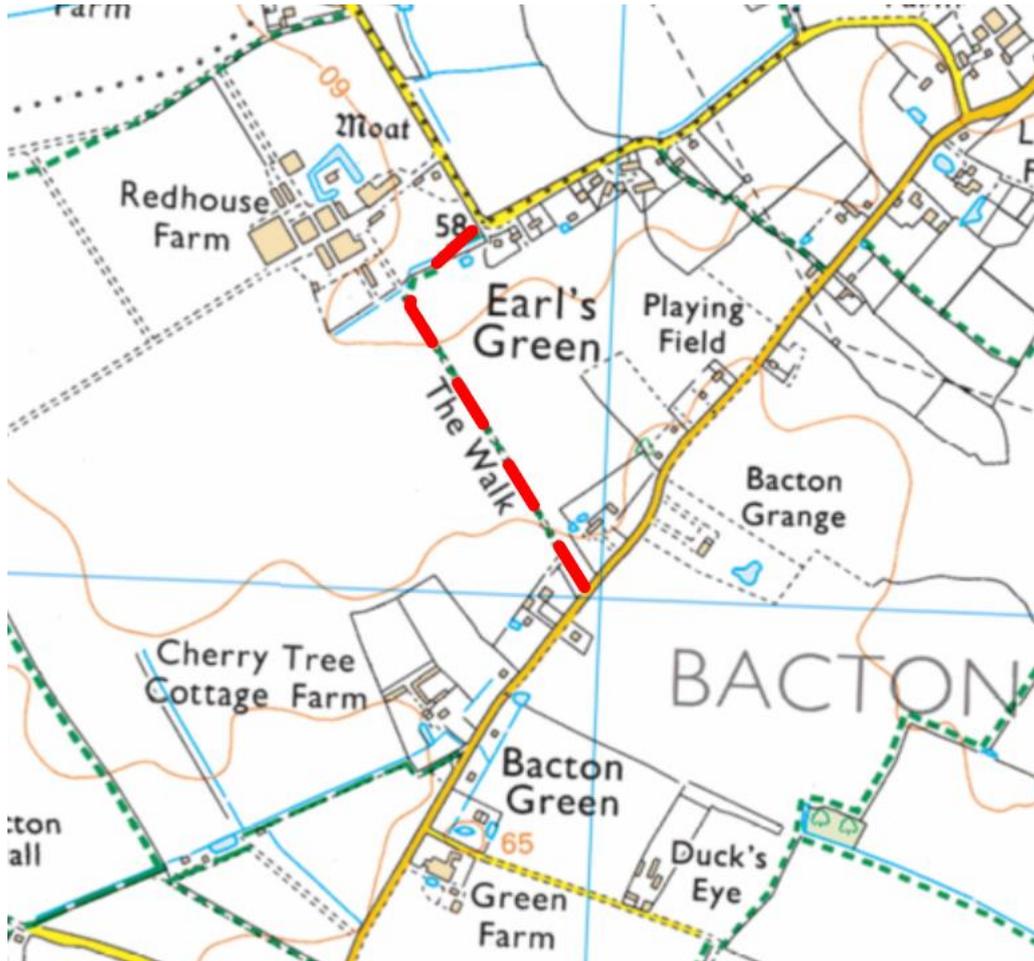
12<sup>th</sup> April 2021

Dear Sir/Madame,

RE: DC/21/02068 | Planning Application. Erection of a replacement livestock unit with associated infrastructure | Red House Farm Bacton Pigs Limited Rectory Road Bacton Suffolk IP14 4LE

I am responding to this consultation on behalf of The British Horse Society, an equestrian Charity which represents the 3 million horse riders in the UK. Nationally equestrians have just 22% of the rights of way network. In Suffolk, they have just **18%** of the rights of way network, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development within the County. It is therefore important that these public rights are protected.

The British Horse Society has no objection to this application in principle but believes that historical evidence indicates Bacton Footpath 5 is under recorded as a footpath, this route can be reasonably alleged to subsist at a minimum of bridleway status. This public right should be asserted and not be allowed to be subsumed within this development or anything beyond it. An application to the County Council to have them recorded as such is likely to be forwarded in due course. The route shown on the map below should be upgraded to at least Bridleway status if not Restricted Byway status as a condition of the permission being granted.



Yours sincerely

Charlotte Ditchburn (Miss.)  
Access Field Officer, East Region

**From:** GHI Floods Planning <floods.planning@suffolk.gov.uk>

**Sent:** 01 June 2021 15:14

**To:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@babberghmidsuffolk.gov.uk>

**Subject:** 2021-06-01 JS reply Livestock Unit Red House Farm West Of, College Road, Wyverstone (Part In The Parish Of Bacton) Ref DC/21/02068

Dear Mahsa Kavyani,

Subject: Livestock Unit Red House Farm West Of, College Road, Wyverstone (Part In The Parish Of Bacton) Ref DC/21/02068

Subject: Red House Farm Bacton Pigs Limited, Rectory Road, Bacton IP14 4LE Ref DC/21/02068

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/02068.

The following submitted documents have been reviewed and we recommend **approval subject to conditions**;

- Proposed Site Plan A1 Ref IP/JB/02
- Flood Risk Assessment, Surface Water Drainage Strategy and Ground Water Protection Strategy Ref 4005 V4
- Flood Risk Assessment – Addendum A Ref 4005 Rev 00
- Drainage and External Works Ref 4005 500 Rev T6

We propose the following condition in relation to surface water drainage for this application.

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated February 2021, ref: 4005 V4) and addendum (dated May 2021, ref: 4005 Rev 00) shall be implemented as approved in writing by the local planning authority (LPA). The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

2. Within 28 days of practical completion of the last dwelling, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks, in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

*Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk*

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

#### Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council  
Growth, Highway & Infrastructure  
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

Your Ref:DC/21/02068  
Our Ref: SCC/CON/1634/21  
Date: 28 April 2021  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



**All planning enquiries should be sent to the Local Planning Authority.**

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

The Planning Department  
MidSuffolk District Council  
Planning Section  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

For the attention of: Mahsa Kavyani

Dear Mahsa,

**TOWN AND COUNTRY PLANNING ACT 1990**

**CONSULTATION RETURN: DC/21/02068**

**PROPOSAL:** Planning Application. Erection of a replacement livestock unit with associated infrastructure

**LOCATION:** Red House Farm Bacton Pigs Limited, Rectory Road, Bacton, Suffolk IP14 4LE

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

Condition: The use shall not commence until the area(s) within the site shown on Drawing Titled: "Proposed Site Plan A1" for the purposes of [LOADING, UNLOADING,] manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

Yours sincerely,

**Kyle Porter**  
**Development Management Technician**  
Growth, Highways and Infrastructure

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: FS/F221521  
Enquiries to: Water Officer  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 16/04/2021

Dear Sirs

**Red House Farm, Bacton Pigs Ltd, Rectory Road, Bacton IP14 4L**  
**Planning Application No: DC/21/02068**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

**Water Supplies**

Suffolk Fire and Rescue Service records show that the nearest fire hydrant in this location is over 140m from the proposed build site and we therefore recommend that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

/continued

OFFICIAL

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control or appoint Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Copy: [sam@ianpick.co.uk](mailto:sam@ianpick.co.uk)

Enc: Sprinkler information

Created: September 2015

Enquiries to: Fire Business Support Team  
Tel: 01473 260588  
Email: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)



Dear Sir/Madam

## **Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development**

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

### **Dispelling the Myths of Automatic Fire Sprinklers**

- Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.
- Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.
- An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.
- Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

### **Promoting the Benefits of Automatic Fire Sprinklers**

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.

- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.
- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

### **The Next Step**

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully

Mark Hardingham

Chief Fire Officer

Suffolk Fire and Rescue Service

**From:** Sam Trayton <[Sam.Trayton@suffolk.gov.uk](mailto:Sam.Trayton@suffolk.gov.uk)>

**Sent:** 12 August 2021 10:18

**To:** Elizabeth Thomas <[Elizabeth.Thomas@babberghmidsuffolk.gov.uk](mailto:Elizabeth.Thomas@babberghmidsuffolk.gov.uk)>

**Cc:** GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

**Subject:** RE: PROW comments regarding DC/21/02068 Livestock Unit Red House Farm, Wyverstone (Part In The Parish of Bacton)

Hi Elizabeth,

Sorry for the delay in getting back to you.

I note that in the newly provided plans, the proposed access gate to the western end of the site has been removed. This addresses the concern raised by our team. If the landowner wishes to pursue the installation of a gate post-development, they will need to consult us first, to ensure that such a structure can be authorised. I don't think a planning condition is necessary in this respect, as highway authority authorisation of structures on Public Rights of Way is a requirement under highways legislation anyway.

Many thanks for your time on this.

Kind Regards,  
Sam

**Sam Trayton | Area Rights of Way Officer**

**Rights of Way & Access**

**Growth, Highways and Infrastructure Directorate**

Suffolk County Council, Rougham Service Delivery Centre

Moore Road, Rougham Industrial Estate, Bury St Edmunds, Suffolk, IP30 9ND

[sam.trayton@suffolk.gov.uk](mailto:sam.trayton@suffolk.gov.uk)

**01284 758542 | 07597 525859**

**I am leaving Suffolk County Council on Thursday 12th August. After this, please direct correspondence to [prow.west@suffolk.gov.uk](mailto:prow.west@suffolk.gov.uk)**

**From:** GHI PROW Planning

**Sent:** 23 April 2021 14:43

**Subject:** RE: MSDC Planning Consultation Request - DC/21/02068

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: Red House Farm, Bacton Pigs Ltd, Rectory Road, Bacton, IP14 4LE – DC/21/02068**

Thank you for your consultation concerning the above application.

The proposed site does contain a public right of way (PROW): Footpath 16 Wyverstone. The Definitive Map for Wyverstone can be seen at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Wyverstone.pdf>. A more detailed plot of public rights of way can be provided. Please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk) for more information. Note, there is a fee for this service.

**We do not object to this proposal, however note that the Applicant has shown an access gate across FP16 on their Proposed Site Plan. Gates are classed as an obstruction on a PROW (even if they are to remain unlocked) and our consent is required to erect one. If they have not already done so, the Applicant MUST contact the Area Rights of Way Officer ([Sam.Trayton@suffolk.gov.uk](mailto:Sam.Trayton@suffolk.gov.uk)) to discuss their plans and make the appropriate application. This is the case even if planning permission is granted. The Applicant MUST also take the following into account, particularly with regard to their plans for planting and any walls or fencing adjacent to FP16:**

1. PROW are divided into the following classifications:
  - Public Footpath – only for use on foot or with a mobility vehicle
  - Public Bridleway – use as per a public footpath, and on horseback or by bicycle
  - Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, e.g. a horse and carriage
  - Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

All currently recorded PROW are shown on the Definitive Map and described in the Definitive Statement (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk).

2. **PROW MUST remain open, unobstructed and safe for the public to use at all times**, including throughout any construction period. If it is necessary to temporarily close or divert a PROW, the appropriate process must be followed as per point 4 below.
3. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

4. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It **DOES NOT** give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
  - To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. **PLEASE NOTE** that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
  - To discuss applying for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
5. **To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible** to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> **PLEASE NOTE** that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
6. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
7. Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

**In the experience of the County Council, early contact with the relevant PROW officer avoids problems later on, when they may be more time consuming and expensive for the applicant to address. More information about Public Rights of Way can be found at [www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/](https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/)**

Thank you for taking the time to consider this response.

**Public Rights of Way Team**  
Growth, Highways and Infrastructure  
Suffolk County Council

Dear Mahsa,

Thank you for consulting me about the proposed development off Rectory Road in Bacton. On reviewing the application documents I have no comment to make, as the development does not meet the threshold in requiring a Travel Plan in accordance with the Suffolk Travel Plan Guidance.

Kind regards

**Chris Ward**

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

Growth, Highways and Infrastructure  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

Enquiries to: Matthew Baker  
Direct Line: 01284 741329  
Email: [Matthew.Baker@suffolk.gov.uk](mailto:Matthew.Baker@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2021\_02068  
Date: 22<sup>nd</sup> April 2021

For the Attention of Mahsa Kavyani

Dear Mr Isbell

**Planning Application DC/21/02068/FUL – Red House Farm, Bacton Pigs Limited, Rectory Road, Bacton: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER), situated close to the cropmarks of a medieval moated enclosure (HER ref. no BAC 003) and artefact scatters dating from the Roman and medieval periods (BAC 022). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment

- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2019).*

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Matthew Baker

Archaeological Officer  
Suffolk County Council Archaeological Service

**From:** Communities <communities@baberghmidsuffolk.gov.uk>  
**Sent:** 01 June 2021 14:37  
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Subject:** RE: DC/21/02068 - Livestock Unit Red House Farm West Of College Road, Wyverstone

Hello Paul,

Thank you for your email, we do not have any comments.

Helen

Helen Bateman  
Communities Officer – Planning and Engagement

**Babergh and Mid Suffolk District Councils – Working together**

e : [helen.bateman@baberghmidsuffolk.gov.uk](mailto:helen.bateman@baberghmidsuffolk.gov.uk)  
t: 01449 724621  
w: [www.babergh.gov.uk](http://www.babergh.gov.uk) & [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** Peter Chisnall  
**Sent:** 30 April 2021 14:38  
**Subject:** DC/21/02068

Dear Mahsa,

### **APPLICATION FOR PLANNING PERMISSION - DC/21/02068**

**Proposal:** Planning Application. Erection of a replacement livestock unit with associated infrastructure

**Location:** Red House Farm Bacton Pigs Limited, Rectory Road, Bacton, Suffolk IP14 4LE

Many thanks for your request to comment on the Sustainability/Climate Change related aspects of this application.

Babergh and Mid Suffolk Councils declared a Climate Emergency in 2019 and have an aspiration to be Carbon Neutral by 2030, this will include encouraging activities, developments and organisations in the district to adopt a similar policy. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability, taking into account the requirements to mitigate and adapt to future climate change.

I have viewed the applicant's documents in particular the Planning, Design and Access and Environmental Statements.

There is scant mention of Sustainability/Climate Change related mitigation in either of these documents. However the nature of the application is such that it is not enough for an outright objection. Therefore if the application is deemed to be permitted I would suggest the following condition.

A Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water ( suggested maximum of 105ltr per person per day).

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Details as to the provision for electric vehicles should also be included please see the Suffolk Guidance for Parking, published on the SCC website on the link below:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmentalmanagement/planningrequirements/>

Regards,

Peter

**Peter Chisnall**, CEnv, MIEMA, CEnvH, MCIEH  
Environmental Management Officer  
**Babergh and Mid Suffolk District Council - Working Together**

**From:** Nathan Pittam  
**Sent:** 29 April 2021 09:39  
**Subject:** DC/21/02068. Land Contamination

Dear Mahsa

**EP Reference : 291679**  
**DC/21/02068. Land Contamination**  
**Red House Farm, Rectory Road, Bacton, STOWMARKET, Suffolk, IP14 4LE.**  
**Erection of a replacement livestock unit with associated infrastructure.**

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>  
**Sent:** 29 April 2021 09:11  
**To:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Subject:** DC/21/02068. Air Quality

Dear Mahsa

**EP Reference : 291676**  
**DC/21/02068. Air Quality**  
**Red House Farm, Rectory Road, Bacton, STOWMARKET, Suffolk, IP14 4LE.**  
**Erection of a replacement livestock unit with associated infrastructure.**

Many thanks for your request for comments in relation to the above application. I can confirm that I have no objection in principle to the proposed development from the perspective of local air quality management on the basis that emissions to air will be strictly controlled by an Environmental Permit issued by the Environment Agency.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
Work: 01449 724715  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** Andy Rutson-Edwards <Andy.Rutson-Edwards@babberghmidsuffolk.gov.uk>

**Sent:** 16 April 2021 11:55

**To:** Mahsa Kavyani <Mahsa.Kavyani@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>

**Subject:** DC/21/02068

Environmental Health -  
Noise/Odour/Light/Smoke

**APPLICATION FOR PLANNING PERMISSION - DC/21/02068**

**Proposal:** Planning Application. Erection of a replacement livestock unit with associated infrastructure

**Location:** Red House Farm Bacton Pigs Limited, Rectory Road, Bacton, Suffolk IP14 4LE

Thank you for the opportunity to comment on this planning application.

- Having reviewed the submitted proposal and reports in support of this application I am satisfied that the odour assessment methodology and conclusions in the AS modelling and Data Ltd report dated 28<sup>th</sup> Feb 2021, indicates that the planned units whilst contributing to the overall odours produced at a slightly elevated level above the EA benchmark at 6 properties are a vast improvement over the existing piggery unit where this is at 18 premises.

Lairage and accumulations of solid waste stored on any muck pad outside can be a source of mal odours and have an adverse impact on amenity, especially during warm climatic conditions, during the summer months

The site will be permitted by the EA where odour management and animal waste control are conditioned within their permit also adding control over this.

I therefore have no objections on odour grounds.

- The ammonia dispersion and deposition methodology also prepared by AS indicates that the site will cause no adverse effects.

I therefore have no objections on Ammonia emissions.

Please consider the following condition recommendations

- I would recommend a Condition is placed on any permissions granted to ensure that there are no pest/fly issues introduced by the new piggery units along the following lines:

Before first use an Odour and Pest/Fly Management Plan to be submitted to and approved in writing by the Local Planning Authority.

Reason – To minimise detriment to nearby residential amenity.

- Lighting Any external lighting associated with the development shall be kept to the minimum necessary for the purposes of security and site safety and shall prevent upward and outward light radiation.
- Demolition and construction works have a potential to cause a detriment affect to the local amenity. I would ask that a condition is added to any decision as follows:

**ACTION REQUIRED PRIOR TO THE COMMENCEMENT OF DEVELOPMENT:  
CONSTRUCTION MANAGEMENT TO BE AGREED**

Prior to the commencement of development details of the construction methodology shall be submitted to and approved in writing by the Local Planning Authority and shall incorporate the following information:-

- a) Details of the hours of work/construction of the development within which such operations shall take place and the hours within which delivery/collection of materials for the said construction shall take place at the site.
- b) Details of the storage of construction materials on site, including details of their siting and maximum storage height.
- c) Details of how construction and worker traffic and parking shall be managed.
- d) Details of any protection measures for footpaths surrounding the site.
- e) Details of any means of access to the site during construction.
- f) Details of the scheduled timing/phasing of development for the overall construction period.
- g) Details of any wheel washing to be undertaken, management and location it is intended to take place.
- h) Details of the siting of any on site compounds and portaloo's.
- i) Details of the method of any demolition to take place, including the recycling and disposal of said materials resulting from demolition. The construction shall at all times be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority.

Reason - To minimise detriment to nearby residential and general amenity by controlling the construction process to achieve the approved development. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, by reason of the location and scale of development may result adverse harm on amenity.

**ON GOING CONSTRUCTION -HOURS OF WORK**

Intrusive work during the construction of the development must take place between the following hours:

Monday to Friday between 08:00hrs and 18:00hrs

Saturday between 09:00hrs and 13:00hrs

No work to be undertaken on Sunday, bank or public holidays

The above is to apply to deliveries too.

*Andy*

**Andy Rutson-Edwards, MCIEH AMIOA**

Senior Environmental Protection Officer

# **Consultee Comments for Planning Application DC/21/02068**

## **Application Summary**

Application Number: DC/21/02068

Address: Livestock Unit Red House Farm West Of College Road Wyverstone (Part In The Parish Of Bacton) Suffolk

Proposal: Planning Application. Erection of a replacement livestock unit with associated infrastructure.

Case Officer: Mahsa Kavyani

## **Consultee Details**

Name: Mr James Fadeyi

Address: Mid Suffolk District Council Depot, Creting Road West, Stowmarket, Suffolk IP14 5AT

Email: Not Available

On Behalf Of: MSDC - Waste Manager (Major Developments)

## **Comments**

Good Afternoon,

Thank you for your email re-consultation on the reserved matters application DC/21/02068.

Waste services do not have no objection to this application.

Kind regards,

James Fadeyi

Waste Management Officer - Waste Services

-----Original Message-----

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>

Sent: 12 April 2021 09:37

To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/21/02068

There is no open space or play equipment associated with this development so we do not need to be consulted.

Regards

Hi Mahsa,

The Heritage Team will not be providing comments on the above application.

Kind Regards,

**Thomas Pinner BA(Hons), MA, MA**  
Heritage and Design Officer  
Babergh and Mid Suffolk District Councils



05 May 2021

Mahsa Kavyani  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** DC/21/02068  
**Location:** Livestock Unit Red House Farm West Of College Road Wyverstone (Part In The Parish Of Bacton) Suffolk  
**Proposal:** Planning Application. Erection of a replacement livestock unit with associated infrastructure.

Dear Mahsa,

Thank you for consulting Place Services on the above application.

**No objection subject to securing biodiversity mitigation and enhancement measures**

**Summary**

We have reviewed the Preliminary Ecological Appraisal (Craig Emms and Linda Barnett, March 2021), the Landscape proposals (LVIA Ltd, March 2021), and the Report on the Modelling of the Dispersion and Deposition of Ammonia (AS Modelling & Data Ltd, February 2021), submitted by the applicant, relating to the likely impacts of development on designated sites, Protected and Priority Species & Habitats.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority Species & Habitats and, with appropriate mitigation measures secured, the development can be made acceptable. This includes precautionary measures for reptiles, nesting birds and small mammals.

The mitigation measures identified in Preliminary Ecological Appraisal (Craig Emms and Linda Barnett, March 2021) should be secured and implemented in full. This is necessary to conserve protected and Priority Species.



In addition, we are satisfied that the Report on the Modelling of the Dispersion and Deposition of Ammonia (AS Modelling & Data Ltd, February 2021) demonstrates that proposed development will not have an adverse impact upon any nearby statutory designated sites, from increases in ammonia depositions. This includes the Gardens, Great Ashfield SSSI, Stanton Woods (SSSI), Westhall Wood and Meadow SSSI, Burgate Wood (SSSI), Norton Wood SSSI, Gipping Great Wood SSSI, and Pakenham Meadows SSSI situated within 10km of the development. This is because the Report on the Modelling of the Dispersion and Deposition of Ammonia (AS Modelling & Data Ltd, February 2021) advises that 'the predicted process contribution to annual mean ammonia concentrations and nitrogen deposition rates would be well below the Environment Agency's lower threshold percentage of the relevant Critical Level and/or Load of the SSSI. Additionally, at all SSSIs considered the exceedances of 1% of the relevant Critical Level/Load would be reduced to below 1%, excepting Westhall Wood and Meadow SSSI, which would continue to exceed 1% by a small margin (1.48%), but this would be reduced from the initial Critical Level present at the site (4.48%). As a result, we are satisfied that the proposal will not affect the favourable conservation status of Westhall Wood and Meadow SSSI.

We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <2700k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170[d] & 175[d] of the National Planning Policy Framework 2019. This includes the placement of hedgehog boxes in the bases of hedgerows and the erection of bird (including a barn owl box) and bat boxes on suitable trees within the curtilage of the farm. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured by a condition of any consent. Furthermore, we are satisfied the Landscape proposals (LVIA Ltd, March 2021) identify there will be new native species hedgerows and mixed planting on the site and we therefore recommend they should be secured as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.



Submission for approval and implementation of the details below should be a condition of any planning consent.

### **Recommended conditions**

#### **1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS AND LANDSCAPE PROPOSALS**

*“All mitigation measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Craig Emms and Linda Barnett, March 2021) and the Landscape proposals (LVIA Ltd, March 2021) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

*This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

#### **2. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

*“A Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority following the recommendations made within the Preliminary Ecological Appraisal (Craig Emms and Linda Barnett, March 2021).*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.”*

**Reason:** To enhance protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

#### **3. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

*“A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*



*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."*

**Reason:** To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson ACIEEM BSc (Hons)**  
Ecological Consultant  
[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

**Place Services provide ecological advice on behalf of Mid Suffolk District Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**From:** Almudena Quiralte - Landscape Consultant <[Almudena.Quiralte@essex.gov.uk](mailto:Almudena.Quiralte@essex.gov.uk)>

**Sent:** 22 September 2021 10:10

**To:** John-Paul Friend <[jp@lvialtd.com](mailto:jp@lvialtd.com)>

**Cc:** Sam Harrison <[sam@ianpick.co.uk](mailto:sam@ianpick.co.uk)>; Ryan Mills - Senior Landscape Consultant <[Ryan.Mills@essex.gov.uk](mailto:Ryan.Mills@essex.gov.uk)>; Elizabeth Thomas <[Elizabeth.Thomas@babberghmidsuffolk.gov.uk](mailto:Elizabeth.Thomas@babberghmidsuffolk.gov.uk)>

**Subject:** RE: DC/21/02068 - Committee preparation in advance

Hi John-Paul,

Thank you for clarifying these. I have gone through your notes and all is good.

We are satisfied with the information provided and can confirm there is no need for landscape condition.

I hope this closes the matters regarding landscape.

Regards,  
Almu

**Almudena Quiralte** BA (Hons) Dip LA CMLI  
**Landscape Architect Consultant** at Place Services  
telephone: 033301 36858 | mobile: 07717 867286  
web: [www.placeservices.co.uk](http://www.placeservices.co.uk)

**From:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Sent:** 14 Sep 2021 03:47:49

**To:**

**Cc:**

**Subject:** FW: DC/21/02068 - Committee preparation in advance

**Attachments:**

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**From:** Almudena Quiralte - Landscape Consultant <[Almudena.Quiralte@essex.gov.uk](mailto:Almudena.Quiralte@essex.gov.uk)>

**Sent:** 27 August 2021 09:22

**To:** Elizabeth Thomas <[Elizabeth.Thomas@baberghmidsuffolk.gov.uk](mailto:Elizabeth.Thomas@baberghmidsuffolk.gov.uk)>

**Cc:** Ryan Mills - Senior Landscape Consultant <[Ryan.Mills@essex.gov.uk](mailto:Ryan.Mills@essex.gov.uk)>

**Subject:** RE: DC/21/02068 - Committee preparation in advance



**EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Happy with this, thank you Liz.

no need for landscape conditions then.



Planning Services  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

29/04/2021

For the attention of: Mahsa Kavyani

**Ref: DC/21/02068; Red House Farm Bacton Pigs Limited, Rectory Road, Bacton IP14 4LE**

Thank you for consulting us on the full planning application for the erection of a replacement livestock unit with associated infrastructure. This letter sets out our consultation response on the landscape impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site.

The proposed replacement livestock buildings are to be sited on land adjacent to the existing pig units at Jacksons Farm. The site is relatively flat and is defined by a combination of open boundaries and those with hedgerows and associated trees. Many PRoW routes are located within the local area, with PRoW 16 also intersecting the site east to west.

The site falls within the Plateau Claylands Landscape Character Area (LCA) (Suffolk Landscape Character Assessment). The characteristic land cover is arable farmland divided by an irregular sinuous field pattern; there is very little ancient woodland, rather a scattering of small copses and occasional plantations associated with farmsteads and field ponds. Generally, developments in agriculture have increased the demand for large-scale buildings and in this landscape and can cause considerable intrusion if the siting, colour and planting is not appropriate, or their visual impact is not adequately mitigated.

The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) (Document ref: IPA1178lvia). This has been carried out in line with the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) and includes an assessment of landscape character and visual receptors. The assessment has summarised that the *"site would be consistent with the current landscape character of both the site and its surrounding context."* and *"the visual effects are minimal due in most part to dense intervening vegetation between the viewer and site, the topography in the area and the similar agricultural setting of the proposed scheme."* For the most part, we agree that the scheme would be in keeping with the agricultural characteristics of this local landscape. However, visually, the impacts on PRoW receptors will be moderate to major adverse and should have key consideration.

A Landscape Proposals plan (Drawing ref: IPA1178-11) has also been provided. This sets out the landscape mitigation proposals referenced in the LVIA. In principle, we have no objections to this, however, if minded for approval, we would advise the following recommendations are taken into consideration prior to determination:

- The mixed native hedgerow proposed along the track should be extended to the edge of the western boundary and be accompanied by hedgerow trees. This would enhance the landscape scheme and help mitigation visual and landscape impacts.

- Elevational treatment needs to be carefully considered. A shade of the colour green is preferred as this will integrate well with vegetation.
- No planting specification has been included. The specification should be in line with British Standards and include details of planting works such as preparation, implementation, materials (i.e. soils and mulch) and any management regimes (including watering schedules) to support establishment.

The following conditions should also be considered:

- **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.**  
No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan that includes a work schedule (including an annual work plan capable of being rolled forward over a five-year period) and details of the body or organisation responsible for implementation of the plan. Both new and existing planting will be required to be included in the plan, along with SuDS maintenance.

If you have any queries regarding the above matters, please do not hesitate to contact me.

Yours sincerely,

Ryan Mills BSc (Hons) MSc CMLI  
Senior Landscape Consultant

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils** Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

-----Original Message-----

From: Planning <[planning@wlma.org.uk](mailto:planning@wlma.org.uk)>

Sent: 14 April 2021 11:08

To: BMSDC Planning Area Team Yellow <[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)>

Subject: RE: MSDC Planning Consultation Request - DC/21/02068

Good Morning,

The Board has no comments to make.

Kind Regards,

Jess

Jessica Nobbs

Senior Sustainable Development Officer

e: [planning@wlma.org.uk](mailto:planning@wlma.org.uk)