

Date: 19 June 2024
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Babergh and Mid Suffolk District Council
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Dear Planning Policy Team

Babergh Mid Suffolk SPD Consultation – Intensive Livestock and Poultry Farming

Thank you for consulting Suffolk County Council (SCC) on the draft SPD – Intensive livestock and poultry farming

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~strikethrough~~.

Within the document the policy context is clear, and the policies consider various factors such as air pollution, noise pollution, etc. The policies effectively address these issues. The Biodiversity net gain (BNG) section is accurate in its descriptions.

However, SCC would like to highlight that while cumulative impacts have been considered, the focus is mainly on the cumulative impacts of intensive farming operations when stacked on top of each other.

There are other cumulative impacts that could be highlighted for consideration. For example, the Suffolk Minerals and Waste Local Plan will highlight minerals developments, which will have similar considerations as intensive farming operations (noise, air quality, highway movements, etc.). It could be noted that cumulative impacts from other industries operating in a rural setting (such as mineral sites) should be considered when assessing cumulative impacts on the local area. Any operations or allocated facilities should be taken into account if they have the potential to cause cumulative impacts on the local area, especially if allocated through a local plan.

Although BNG is covered in a small section as a requirement, this could be expanded to show how intensive farming can work alongside the ambitions for BNG delivery. Farms will be a valuable asset for BNG delivery in the future if managed correctly. The importance of this is touched on in comments from our Farming Projects and Programme Manager.

County Farms

Comments from the Suffolk County Council Farming Projects and Programme Manager:
SCC County Farms primary perspective on the matter, focusing on supporting farmers and farming,

while also aiming to increase biodiversity and reduce carbon emissions. It is important to note that intensive farming is not necessarily detrimental to the environment, as there are economies of scale in terms of efficiency, emissions, and raising more animals on less land.

Increase Biodiversity and Reduce Carbon Emissions:

The primary goal should be to enhance biodiversity and reduce carbon emissions across farming operations.

Create Biodiverse Habitats:

Livestock areas can be transformed into mini wildlife sanctuaries. By creating biodiverse habitats within farming spaces, we can provide a home for local wildlife while maintaining farming operations. This approach can be mutually beneficial for both nature and livestock.

Reduce Carbon Footprint:

SCC would suggest exploring alternative energy sources, such as solar panels or wind turbines, to power farm operations and reduce carbon footprints.

Adopt Regenerative Farming Practices:

Implement regenerative farming practices that benefit crops and livestock, improve soil health, and enhance biodiversity. Methods that work with nature can create a more sustainable and diverse ecosystem on the farm.

Collaborate with Local Conservation Groups:

There are opportunities to collaborate with local conservation groups. Implementing wildlife corridors or creating buffer zones around the farm can support local biodiversity and demonstrate a commitment to the environment while benefiting farming practices.

Integrate Agroforestry:

Agroforestry can enhance biodiversity while sequestering carbon. Integrating trees and shrubs into the farming landscape can provide habitat for wildlife, improve soil health, and contribute to sustainability goals.

Encourage farmers to embrace innovative and sustainable practices that align with the goals of increasing biodiversity and reducing carbon emissions. Farmers should demonstrate a proactive approach to integrating environmental stewardship with farming operations.

Planning Process and Policy Considerations:

Intensive Farming and Biodiversity:

Ensure that the planning process considers the potential impact of intensive farming on biodiversity and the environment. Planning policies should align with the goal of promoting SCC's biodiversity and net-zero targets.

Mitigation Measures:

Address the need to mitigate the potential impact of intensive livestock and poultry farming on local ecosystems and protected species, particularly regarding nitrates from animal waste runoff (NVZs). Planning could include guidance on incorporating measures to enhance biodiversity, such as creating wildlife habitats, preserving green spaces, and minimizing the disruption of natural habitats.

Net Zero Objectives:

Consider the role of intensive farming in contributing to greenhouse gas emissions and climate change. Provide guidance on promoting sustainable farming practices, reducing carbon emissions, and enhancing energy efficiency within intensive livestock and poultry operations to align with net-zero objectives.

Overall, intensive livestock and poultry farming should strike a balance between meeting the demand for food production, safeguarding biodiversity, and contributing to net-zero emissions. It is essential

to review the specific details of the planning application to gain a comprehensive understanding and implement effective mitigation measures. Collaborating with developers and farmers to contribute to our targets of increased biodiversity and reduced emissions, while supporting food production and farmers, is crucial.

Landscape

SCC would suggest that the title of this SPD include the word "Farming" at the end, in order to be more aligned with JLP Policy LP14, i.e.;

"Intensive Livestock and Poultry Farming - Supplementary Planning Document"

SCC would recommend that the title of section 5.7 is expanded as below, to be more in line with the text from policy LP14:

"5.7 LP14 (1) [f] - serve to minimise visual and landscape impact and incorporate suitable landscaping proposals"

Paragraph 5.7.2 of the Draft SPD refers to JLP Policy LP17 – Landscape, pointing out that this policy provides (together with other policies) the guidance necessary to enable applicants to ensure that development proposals comply with landscape quality objectives.

Policy LP17 states in paragraph 15.23:

"Where development is visually prominent or is likely to significantly affect landscape character, production of a Landscape and Visual Appraisal (LVA) or Landscape and Visual Impact Assessment (LVIA) (as appropriate) will be required. This should inform strategic landscape masterplans and/or landscape management plans detailing mitigation proposals if required."

The reports/assessments section of the Draft SPD (paragraph 5.7.6) refers however to Landscape and Visual Appraisals (LVA) only, a simplified and less strenuous assessment than a full Landscape and Visual Impact Assessment (LVIA). LVAs are suitable for smaller and less complex developments. Larger or more sensitive developments, and particularly those requiring an Environmental Impact Assessment (EIA) need to include a full LVIA as part of the Environmental Statement (ES). SCC would suggest that this is explained in this SPD.

For developments requiring an EIA, a number of photo montages from selected representative viewpoints should be agreed with the Local Planning Authority in advance. They do not only help the representatives of the Local Planning Authority in their assessment of the proposal, but are also very important for public consultations.

SCC would suggest the following minor amendments to paragraph 5.7.4:

"5.7.4 Potential impacts include:

- Increased scale of buildings and use of materials that are not characteristic of the rural landscape.
- Visual impact of development and infrastructure where there was previously open countryside.
- Loss of tranquillity and remoteness due to introduction of movement, light, sound.
- Reduction in quality of landscape character, ~~such as~~ through key feature removal (hedgerow, trees, alteration of the natural topography).
- Increased transport requiring road widening and visibility splays, therefore loss of characteristic rural lanes.
- The incremental effects of development, including extensions to existing sites, erodes the landscape character ~~features, including extensions to existing sites~~"

SCC suggest the following amendments to paragraph 5.7.8:

“5.7.8 The plan should include:

- Hard landscape details, such as levels, surfaces, and ~~boundaries~~ boundary treatments.
- Soft landscape proposals ~~such as~~ showing existing and new planting, such as Tree shelter belts, buffer zones and other mitigative planting in an appropriate scale (such as 1:200) and providing clear specifications (species, sizes, densities, total numbers, provenance, soil preparation, aftercare and management, including, but not limited to, watering and weed control).
- Details of external materials, colours and finishes. These should be chosen with the surrounding landscape in mind and with reference to the local geology and seasonal changes.
- Details of any ecological and biodiversity enhancements that are required (BNG) and integrated drainage solutions. Integrated drainage solutions should follow the Sustainable Drainage Systems (SuDS) hierarchy with respect to surface and water flows, taking account of the potentially higher nutrient and/or contaminant levels in the water content.
- A separate lighting design should be submitted, that addresses landscape as well as ecology (wildlife) requirements.”

Transport

SCC notes that paragraph 5.8.5 refers to a “Transport Impact Assessment”. It would be clearer if this referred to a Transport Assessment or Statement, as alluded to within previous paragraphs.

SCC would encourage addition of reference made to Transport Assessments/Statements considering alternatives to private vehicles – such as the provision of busses for staff

While the focus is on motor vehicle movements, for the rurality reasons, a Transport Assessment would normally include some recognition of the role of sustainable transport. In some cases, the operators put on staff buses to reduce the non-HGV traffic impacts, and acknowledging that this work is often relatively low-paid, and employees may struggle to afford a private car.

This is the sort of mitigation that could be secured by S106 or conditions.

SCC welcome the inclusion of reference to our Suffolk Lorry Routing map¹, as this has been recently updated.

General

Paragraph 5.3.11 Biodiversity net gain

It is suggested that this section could make direct reference to the Environment Act, and that BNG is not a “desirable” but is a legal requirement for development. We note the cross reference to the emerging Biodiversity and Trees SPD, and SCC have provided comments separately in relation to that consultation.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have.

¹ <https://www.suffolk.gov.uk/roads-and-transport/lorry-management/lorry-route-plan-review-in-suffolk/recommended-lorry-route-network-map>

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague
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Suffolk County Council