



Tom Barker
BABERGH AND MID SUFFOLK DISTRICT
COUNCIL
8 (First Floor - Gold Block 1) Russell Road
Ipswich
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Our ref: [REDACTED]
Your ref: Draft Supplementary Planning
Date: 19 June 2024

Dear Tom

FOLLOWING ADOPTION OF THE BABERGH AND MID SUFFOLK JOINT LOCAL PLAN PART 1 2018-2037 DEVELOPMENT PLAN DOCUMENT (DPD) IN NOVEMBER 2023, THE COUNCILS HAVE PREPARED THREE DRAFT SUPPLEMENTARY PLANNING DOCUMENTS (SPDS) RELATING TO BIODIVERSITY AND TREES; HOUSING; AND INTENSIVE LIVESTOCK AND POULTRY FOR CONSULTATION. THE DRAFT SPDS PROVIDE FURTHER GUIDANCE AND DETAIL FOR DEVELOPMENT PROPOSALS, SUPPORTING THE IMPLEMENTATION OF PLANNING POLICIES CONTAINED WITHIN THE ADOPTED BABERGH AND MID SUFFOLK JOINT LOCAL PLAN PART 1 DPD.

ENDEAVOUR HOUSE RUSSELL ROAD, IPSWICH, SUFFOLK, IP1 2BX.

Thank you for consulting us on the Draft Supplementary Planning Documents. We have provided our comments below.

Ecology

The Biodiversity and Trees SPD comprehensively covers many aspects of integrating biodiversity and tree management into the planning process. However, we recommend the following:

1. More specific guidelines and examples from case studies or detailed best practice examples, to increase the practical applicability of the SPD and provide more of a framework for practitioners.
2. A greater emphasis on follow-up maintenance and monitoring: there should be detailed plans for the maintenance of habitats, hedgrows and SuDS for example, as this is often where development proposals can be lacking. It must be emphasised that responsibilities for follow-up need to be enshrined at the planning stage, to prevent neglect of projects after their completion.
3. Further encouragement of stakeholders to be involved in the monitoring and adaptive management processes.

Land and Water

The Intensive Livestock and Poultry SPD covers the environmentally impacts associated with Intensive Livestock Farms. We recommend the following:

1.2 Intensive farming operations 40,000 places for poultry; (ii) 2,000 places for production pigs (over 30kg) and/or (iii) 750 places for sows will require a bespoke permit under the Environmental Permitting Regulations (England and Wales) 2016 we recommend parallel tracking of intensive livestock planning applications and our permitting process. Applicants should contact the us for pre application permitting advice at the same time as making an application to the Local Planning Authority.

Paragraph 5.2.1 Recommended that noise and pests including but not limited to flies are added.

With regards to paragraph 5.2.23 noise from the livestock itself should be considered particularly that from pigs.

Paragraph 5.2.4 Pests such as flies should be included in this list.

5.4.1 and 5.4.6 If development requires water from any other source than mains water such as surface waters or ground waters the applicant should be mindful that they will require a water abstraction licence. They should contact the Environment Agency for pre application for advice on the availability of water in the catchment and a preliminary decision on whether a licence will be granted. Pre application advice should also be sought for any increases in water associate with the extension of existing farms. There is no guarantee that increases in volumes will be permitted.

5.5.2 It should be noted that the Woodland Trust uses lower critical load (ammonia) and critical levels (nutrient enrichment) when assessing the impact of ammonia emissions on ancient woodland.

As stated in paragraph 5.11.1 it is important to consider the proximity of new residential and sensitive developments to existing intensive pig and poultry sites. The environmental impacts of the farm on new developments should be taken into consideration.

We should be consulted on new developments next to existing intensive livestock and poultry farms.

We trust this advice is useful

Yours sincerely



Mr Andrew Thornton
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