

Statement of Case for call in of 2 planning applications

Section One – Orientation

1. Who is requesting the Call in?

Stradbroke Parish Council, Shadingfield Parish Council and Thorndon Parish Council together seek this call in.

2. Which applications are affected?

East Suffolk

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

Mid Suffolk

DC/20/02052 | Full Planning Application - Erection of **4no. poultry houses** with associated admin block, store, feed bins and alterations to vehicular access (accompanied by an environmental statement) | Castle Hill Farm Castle Hill Thorndon Suffolk IP23 7JT

3. Why is Call in requested?

1. There has been no oversight of the activities of the factory or its satellite units due to the fragmented Development Management planning system, the division of County and District Councils, and the lack of policy modelling of the factory for Local Plan purposes. Many of these activities from south east Norfolk and south and east Suffolk have a cumulative and severe impact on a small area of one small district council with very limited lorry route systems and only three including B roads B1117 and B1118 to serve distribution to the factory. **Annex 1 overview of recent operations for Cranswick factory in Suffolk/Norfolk.**

2. To achieve planning consistency in a fragmented system. The same transport methodology has been applied to both applications with similar conclusions, that there is no severe impact locally. However, they are being determined by two different councils and neither is considering

the true local impact
the wider impact

due to flawed input modelling of transport movements that understate traffic movements.

3. Both applications feed into and are entirely underwritten by the same end user business. It is argued that the applications if separately consented

- may conflict with national policies on important matters;
- *cumulative impact and severity of impact are strongly indicated*

- [may have significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority];
 - *East Suffolk and Mid Suffolk are populated rural areas, Stradbroke has a made Neighbourhood Plan, with ambitious housing growth targets, Shadingfield has an emerging Neighbourhood Plan.*
 - The cumulative effect will be to deter people from living in these areas due to the huge traffic increase on a small area and inadequate road systems*
 - could have significant effects beyond their immediate locality;
 - *The transport impacts of the feeder units will spread across the whole region;*
 - *The methodology sets a precedent for permitting schemes that under report vehicle movements to the detriment of rural populated areas leading to sterilised land with no housing development value.*
4. The applicant for Thorndon has written regarding a proposal that will supply 1,300,000 birds that it is a “minor” development. It clearly is not. Yet this assertion has been accepted by SCC as CHA. This is unacceptable. The HTTC Transport Statement for Thorndon states: (Annex 2)
- “1.13 The proposed improved private access to this application proposal seems to be larger in terms of the overall geometry and seems to be provided with larger visibility splays than the Barric Lane junction. The improved application site access also will be used by significantly fewer vehicles, including very few articulated hgv’s. Hence, it follows that the application site access should be acceptable to the CHA.”*
- “1.14 This is particularly so as the articulated hgv flows will be to and from the recently approved and constructed Cranswick site at Eye Airfield. It is noted that the CHA made no adverse comments about the movement of articulated hgv’s through Eye in relation to that very large development. The proposal was for a B2 building with a floor area of 20,450sq.m. that was to be used for chicken processing. The CHA did not require any mitigation within Eye, or on road routes to the south of Eye, including the B1077. **Therefore, it cannot be reasonable or realistic for the CHA to try and require any such mitigation for this extremely minor (in actual and in comparative vehicle flows) development proposal.**”*

Section Two - Background to call in request – Annex 1 refers

1. Cranswick Chicken have developed a 10 ha site to provide a poultry processing factory on Eye Airfield, Mid Suffolk. This can process up to 130 million chickens per annum (15,000 per hour) according to the main equipment supplier Marel running at full capacity
<https://marel.com/customer-stories/15000-bph-greenfield-plant-offers-cranswick-new-opportunities/>
2. Cranswick state in their annual report they will process up to 62 million birds per annum:
“Our new, purpose built, chicken processing facility in Eye, Suffolk, will more than double our existing fresh poultry business by producing up to 1.2 million Red Tractor farm-assured birds each week. The facility will be fully commissioned before the end of

the new financial year. Marel are supplying the very latest technology and the most advanced equipment including robotics, automatic deboning, X-ray bone detection and efficient fifth quarter harvesting. Processing line speeds are paramount and we will be able to process faster and more efficiently than any of our UK competitors whilst still focusing on premium quality.”

<https://cranswick.plc.uk/sites/default/files/Annual%20report%20FY19%20-%20view%20online.pdf>

3. Annual factory capacity is assumed as 90 million birds per annum using 20 hours per day, 300 days per year and 15,000 bph. We have no confidence in future audit and accountability to limit the factory to its stated capacity of 62 million bpa, based on prior experience of planning breaches elsewhere.
4. An EIA was not requested for nor submitted with the factory application even though it requires one by virtue of footprint size (10ha) and production scale.
see Annex 1
5. The factory was therefore consented and built without any cumulative traffic Impact Assessment on the road network in Mid Suffolk and further afield.
6. This road network consists of many small lanes servicing family farms and cannot easily be adapted over a wide area to take large quantum of heavy traffic.
7. Cranswick /Crown Chicken propose to source most of the birds from production units in Mid and East Suffolk.
8. Individual farmers are therefore submitting proposals for poultry units in clusters of 3, 4 sheds and above.
9. All aspects of financing and management in the proposed applications are under the direct control of Cranswick and not the farmers (see Shadingfield below).
10. Each individual farm application submits its own traffic assessment. This focusses also only on the local issues for that farm, ignoring wider cumulative impact.
11. Suffolk County Council as Highways Authority has not modelled cumulative impact of the factory into its transport modelling evidence documents prepared for Local Plans in East Suffolk and Mid Suffolk District Council
12. There is no effective mechanism to evaluate cumulative impact on the highway of the number of vehicle movements involved in each of these applications in the following ways:
 - driving to site; collect and deliver 1,000,000 + chickens per annum to factory
 - delivering bedding and feed and returning empty from site

- driving to site collecting waste driving away from site

Section Three - Justification for call in request

1. The methodology inputs in both transport statements/reports are flawed and interconnected by extrapolation from one, Shadingfield to the other, Thorndon.
2. Both proposals are written by the same consultant. The result of applying the method is significant under reporting in both cases, but more so in Thorndon as the under reporting is compounded by a factor of 4.3.
3. The output of this flawed methodology is cumulative under reporting of several thousand vehicle movements per annum within a small geographical area on unsuitable roads.
4. The two planning proposals produce 2.3 million birds per annum. This represents just 3.7 % of Cranswick's stated factory target of 62 million birds per annum.
5. Crown/Cranswick control all of the farm operations which are in effect puppet operations.
6. Crown Milling and Cranswick also control upstream and downstream operations
 - Denham drying and milling operation
 - Barley Brigg Farm forced drying (application pending due to conflict of site roles between SCC and MSDC with Barley Brigg Biodigester)
7. The highways impact of just these two units, is thus created by Cranswick; it is cumulative; it is severe; it is significantly under reported; it will worsen with each new proposal; and there are several new farms being lined up.
8. SCC has stated (see Annex 3) regarding the wider picture of planning applications that:

It should be noted that many of the direct and related poultry industry development applications come forward as agricultural permitted development, ie the expansion of existing business use. As such it is not possible to assess the cumulative impact of these sites and they may not be identified specifically within the local plan. From the planning applications to date, the sites individually result in low levels of increase in HGVs, accepting that for delivery of chickens to the processing site at Eye, there are higher levels approximately seven times a year.

9. This is incorrect. PDR development are a minority element of the whole operation , All major poultry production unties are being submitted as planning applications.**Annex 1 refers.**
10. One site Barley Brigg is adopting a Salami slicing approach. The site is both a biodigester and a farm and the farm is now part of the poultry feed operation

11. SCC has simply accepted the consultants modelling outputs without examining the methodology in detail. The above extract above evidences this SCC has accepted the basis of the planning application transport statements to model the traffic flow and not the actual flows generated by the factory itself.
12. There is precedent for SCC reliance on the applicant's transport modelling method statement. The same consultant modelled vehicle movements for an application for Barley Brigg biodigester to SCC as Waste Authority (Annex 4) resulting in a similar under reporting of vehicle movements. That scheme is now subject to planning enforcement action (Annex 5)
<http://suffolk.planning-egister.co.uk/Planning/Display?applicationNumber=MS%2F3892%2F15>

Section Four - The Call In applications

East Suffolk

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

A. Planning Statement

1. Extracts from the applicant's planning statement Business Model. Crown Chicken/Cranswick control all the applications

"Working in collaboration with Crown Chicken Ltd offers us a unique opportunity to move forward with a sustainable business model by us providing husbandry and shed insurance while Crown Chicken Ltd would finance & supply everything else."

2. Scale of operation = shed capacity x number of cycles = 987,000 chickens per annum

Each of the new buildings will accommodate roughly 47,000 broiler chickens based on the maximum stocking density of 38KG/m² with thinning. Therefore the number of birds housed over the three sheds will be around 141,000 although the stocking for much of the time will be less than this with approximately 7-10 days empty each cycle. Also other systems maybe operated with lower stocking densities. The three houses will be equipped with 5 x 20 tonne feed bins".

The submitted application also indicated the following:

- The operation is undertaken 24 hours a day
 - Deliveries and dispatches will happen inside of normal farm working hours – in lay terms 'daylight hours'
3. Traffic movements do not mention waste out or feed in; appear to be based on one cycle not on 7; report on vehicles not vehicle movements, this figure must therefore be doubled from 414 to 828 as a minimum.

"There will be approximately 7 'cycles' of birds each year with 57 vehicles expected to be associated with each cycle and an approximate total of 414 vehicles per annum; being just over one a day on average."

B. Transport Consultant statement method

The detail of method is included in the appendices' report from the Stradbroke Parish Clerk as Proper officer details transport movement to and from Thorndon (Annex 6). The base line vehicle movement assumptions are taken as ¾ of the stated vehicle movements in the Thorndon proposal.

C. Extract from East Suffolk Planning which scoped out transport

"Matters to be scoped out:

*1. Transport – Based on the connections this site has to the main highway network, the **proposed number of additional vehicle movements created by this form of agriculture are unlikely to have a significant impact upon the highway and can be scoped out.** A transport assessment should be included as a submission within the 'suspended' planning application"*

Mid Suffolk

DC/20/02052 | Full Planning Application - Erection of **4no. poultry houses with associated admin block, store, feed bins and alterations to vehicular access (accompanied by an environmental statement) | Castle Hill Farm Castle Hill Thorndon Suffolk IP23 7JT**

A. Planning Statement

MSDC screened in transport to the EIA. That is how we have found the lack of soundness in the applicant methodology

The applicant's transport assessment methodology for Thorndon is extrapolated from Shadingfield, the transport analysis by Stradbroke Clerk refers (Annex 6) It is based on a 4/3 multiplier principle and applied to Thorndon but with no supporting equivalent analysis in the Shadingfield report.

The analysis (Annex 7) shows an under reporting of a minimum increase of 3,800 vehicle movements per annum for that specific proposal as detailed in that analysis.

Section Five – the third application, SCC Biodigester, the same consultant, the same under reporting

1. Planning Application - MS/3892/15 sets out the projected traffic movements for the Barley Brigg Biodigester in the attached traffic statement

1.12 Taking each of the above feedstock movements, and attributing hgv and tractor flows to them, I assess the following as worst case flows at the site access, based on technical data supplied by the applicant.

Feedstock imported Vehicle flows at existing access

- a) 6000 tonnes manure and slurries nil*
- b) 2000 tonnes energy crops nil*

5000 tonnes energy crops [5000/29t hgv]
 172 x 2 trips = 344 trips over 3 months = 344/90 = 4 hgv's/day
 c) 4000 tonnes sugar beet pulp – one load per day 2 hgv's/day
 d) 2000 tonnes chicken litter – 2000/16t tractor
 125 loads pa = 250 trips pa
 say 6 trips/week for 42 weeks
 say 2 trips/day for 3 days of each week 2 hgv's/day
Digestate removal.
 e) Solid digestate = 12% x 21000t = 2520 t/14t tractor
 180 loads pa = 360 trips pa over whole year
 360/52 = say 6 to 8 trips/week
 say 2 trips/day for 3 or 4 days of each week 2 hgv's/day

2. This shows how the HGV definition is applied to all large vehicles. There are two sizes of tractor and tractors and one size of HGV. They are called HGV's.
3. In a breeder unit there will be 40 tonne HGV's and that appears to be the method for calculating the HGV number equivalent.
4. The problem with the Digester is that the waste removal was underestimated by a factor of several thousand tonnes as the attached FOI shows. (Annex 8)

Section Six – conclusion

1. There is every possibility the under-modelled vehicle movement issue will recur in the two applications as at Barley Brigg. If movements are as we suggest the implications will be very serious for the whole of the county and there is little that can be done to stop it once the schemes are consented. Enforcement now leads to renegotiated limits on site uses and not management. This is evidenced by similar problems in Powys which is experiencing this problem of over farming the countryside, that has turned the countryside into a large agri business.
<https://www.countytimes.co.uk/news/18478165.call-moratorium-intensive-chicken-farming-powys/>
2. Stradbroke will become a focal point for all of the traffic moving to the factory as a consequence of the proposals. The only lorry route (Annex 9) is a feeder route to the village from the A 140. It is now a through route for all traffic and will experience severe impact due to wider activity. This will jeopardise housing development in the village as set out in the made Neighbourhood Plan.
3. This has a national significance for all rural areas where this type of development is proposed. If the units all fronted main roads it would not be a problem, however they do not. The fabric of the countryside is threatened by these and other proposals that prioritise industrial scale animal breeding over good living conditions.
4. There is no expectation of consistent application of policy in these cases as the proposals have been treated as minor when their cumulative impact has not been

assessed.

5. That impact is seen in the appendices' report on Thorndon which sets out an under reporting of 3,800 movements per annum, based on Shadingfield, meaning the movements from there will be 2,800 additional movements per annum.
6. The most direct line to Eye is not along the A143 but the B1116 through Stradbroke and that means the villages along that route including Stradbroke will be disproportionately impacted by the vehicle movements from Shadingfield but this has not been taken into account.
7. Thorndon will be overwhelmed as will Shadingfield and the three settlements will be severely affected by the cumulative impact of the two proposals.
8. We therefore ask the Secretary of State to exercise his powers to call in these proposals and determine them. They are co-dependent and set a dangerous precedent for the industrialisation of populated countryside in all parts of the UK at the expense of housing.
9. This is an unsustainable industry in this location. There are green high-tech land use alternatives eg hydroponics and aeroponics which present less health risk in view of the avian flu problem, that create more jobs and use less resources to produce food for mass consumption.
10. That green revolution needs to be kickstarted urgently and one way to do this nationally is to discourage the promulgation of these units in unsustainable rural locations such as East and Mid Suffolk.