

# The Hadleigh Society

*Caring about Hadleigh - yesterday, today and tomorrow*

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on behalf of  
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Growth & Sustainable Planning

Babergh District Council  
Endeavour House  
8 Russel Road, Ipswich  
IP1 2BX

*1 August 2018*

Dear Sir or Madam,

**Full Response from the Environment & Planning Group on behalf of the  
Hadleigh Society  
concerning  
Application No. DC/18/02327  
Change of use of land to form a Business Park incorporating a mix of B1, B2 and B8  
commercial and industrial units.  
Grazing Land South Of Hadleigh Bowling Club, Stone Street, Hadleigh, Suffolk**

These comments are submitted on behalf of the Hadleigh Society, one of whose aims is:-

*“To protect and enhance Hadleigh’s heritage and environment by supporting and promoting high standards in planning, conservation, regeneration and development of features deemed to be of historical or environmental significance in the town.”*

The site is located in the pleasant, rural, rolling valley farmlands, of the northern vale of the River Brett, off Stone Street. Stone Street contains several old and picturesque cottages including two listed buildings and culminating in the Grade II\* Kersey Mill and its outbuildings in attractive park/garden grounds north of the site. In many ways the area is the epitome of the rural, upper reaches of the River Brett which has, quite understandably, been designated as a Special Landscape Area.

The proposal is to create an Industrial Trading Estate with 2800 sq. m. (30,000 sq. ft) of general and light industrial factories and warehouses, on 1 hectare (2.5 acres) of greenfield valley slope which is currently set to pasture and grazing land. The development will also involve extensive cut and fill operations over the whole of the remaining 1.55 hectare (4 acres) of the site.

The submission seeks to persuade one that the site is eminently suitable for the Industrial Estate with purported minimal impact on the visual amenity and ecology of the area, whilst in fact, it is extremely insensitively located, has few, if any, sustainability attributes, is disruptive to adjoining recreational facilities, and lacks any understanding in use of good design principles in creating a rural business park or provisions for enhancing the landscape.

As such the development fails to meet numerous criterion and policy requirements contained in the:-

- Revised NPPF, p.11, p.108, p.110, p.124, p127, p.130, p.150(b), p163, p.170(a & b),
- Core Strategies CS3, CS11,CS12,CS13,CS14,CS17 and in particular CS15,
- Saved Local Plan Policies - CN04 & EN22,
- The Suffolk Landscape Character Assessment (SLCA), and
- Joint Babergh and Mid Suffolk District Council Landscape Guidance 2015.

Most importantly the development fails to meet the prime objectives of sustainable development as required in Revised NPPF para.11 and CS1 of the Core Strategies as its adverse impacts demonstrably outweigh any benefits for a presumption in favour of approval.

The Society therefore object to this proposal on the grounds of its permanent damage to:-

- **The Landscape:-**

- The buildings will be clearly visible from well walk public footpaths to south and west of the site and in vicinity of Water Lane & Mill Lane in Kersey.
- The suggested Mitigating Landscaping Proposals are wholly inadequate with no planting on the most exposed western boundary where the highest buildings are to be located.
- The landscape proposals that are made are of poor quality, with no details of number, type, and species of planted material so one is unable to assess establishment nor likely growth etc.
- Some of the areas of suggested boundary planting are not even within the site or control of the applicant.
- The planning policies require that a proposal in this location ought maintain and/or enhance the landscape. The proposals do neither as it is admitted in the Landscape Appraisal, that buildings are to be seen in tandem with the existing industrial buildings at Supreme Pet Foods, and that additional planting is stated to be deliberately kept to a minimum, whereas extensive new planting would be more in accord with landscape policies and mitigation of its visual impact.
- 9 metre high structures are placed on highest part of proposed estate with bright coloured roofs creating an increased visual impact, even greater than the adjoining pet food factory.
- The scheme fails to accord with guidance on the placement of tall buildings, treatment of new development in valley bottoms and mitigating landscape proposals for this

specific Landscape Character Area. (see 18 Guidance Note Rolling Valley Farmlands last para 7 to 11, - Suffolk County Council and the The Suffolk Landscape Character Assessment)

- No assessment is made regarding light pollution generated by the development within the landscape
  
- **The ecology of the site and surroundings:-**
  - Despite the assertions to the contrary in the submission, the whole 2.6 hectare (6.5 acres) site of the meadow hillside will be subjected to destructive cut and deposit operations, particularly when taking into account the operational areas required by the earth moving machinery.
  - In absence of any ecological survey there is no knowledge of the extent of damaged caused, and no ability to assess appropriate restoration and planting details.
  - No details are given as to how the new, battered, steep slopes are retained, or how such areas might subsequently be beneficially used and maintained.
  
- **The amenities and enjoyment of Hadleigh Bowls Club:-**
  - The club (with in excess of 300 members) is to be surrounded on two sides by industrial roadways so disturbing the club building and playing areas with 12 hour movement of cars, vans and HGV's along its boundaries.
  - Units 3 to 5, & 10 to 16's service/parking/loading unloading areas are all oriented toward the Club and the playing rinks such that it will focus and amplify noise nuisance and disturbance into those recreational areas.
  - All lighting for roadways, service yards and buildings will be on the perimeter of the site adjacent the club and grounds with consequent nuisance.
  - There is potential flooding to the playing greens from surface water run off from the development thereby damaging the playing surfaces.

Additionally the scheme fails further by reason of :-

- **Lack of Sustainable Modes of Transport:-**
  - Stone Street does not benefit any dedicated or safe pedestrian footway serving the site
  - Indeed the nearest metalled public footpath is 800 metres (half a mile) south of the site and A1071 bypass,
  - The Stone Street carriageway is only 6 metres wide and therefore of substandard desirable width for ease of passing of HGVS,
  - It is not capable of providing cycleways, nor capable of widening to provide pedestrian footpaths,
  - It has limited street lighting for safe pedestrian and cycle movement,
  - There is no bus stopping service within Stone Street,
  - No lay-by, or pull-in within Stone Street for the safe stopping, embarkation and disembarkation of passengers from motor vehicles or public service vehicles.

- Within the site there is no safe separation of pedestrians from movement of cars, commercial vehicles and heavy goods vehicles.
  - The only safe means of transport mode to serve the site is via the motor vehicle, this limitation also has the effect of disadvantaging those with disabilities and/or unable to drive to be able to seek or retain employment on this estate.
- **Lack of Energy Conservation provisions:-**
    - The development makes no contribution to sustainability of energy as there are no proposals for inclusion of renewable sources such as solar panels, ground heating or solar water heating.
    - There are no proposals for energy conservation within the units other than basic Building Regulation requirements for insulation.
- **Lack of Sustainable Foul and Surface Water Disposal/drainage.**
    - the disposal of surface water by SUDS is not proven and it is stated in the application that surface water runoff could cause flooding on adjoining land - such a situation is unacceptable,
    - if surface water is to be discharged direct to a watercourse via drains there are none known to be available,
    - foul drainage is proposed to be by a Package Treatment plant, but details of size, location and discharge are not given or whether the treated effluent can be satisfactorily discharged into the ground or a watercourse, particularly as this area is at potential risk of flooding, has steep slopes and possibly a high water table.
- **Lack of use of Brownfield Land or Coherent Rural location**
    - No proper sequential testing for provision of the development has been made to determine whether there are more appropriate alternative sites.
    - The development does not make use of any brownfield land, instead the whole proposal is on greenfield land.
    - The site has no close proximity with any 'Core' or 'Hinterland' villages and thus does not serve any of those designated communities in any sustainable manner as required by policy in the Revised NPPF and CS11 & CS17.
    - The development does not meet any identified strategic or specific need in the Hadleigh area for establishment of an Industrial Trading Estate located remote from the town.

Finally these objections to, and deficiencies in, the proposal are exacerbated by its:-

• **Poor Design:-**

- The scheme is described as a “Rural Business Park”, but on examination it is clearly akin to an “Industrial” or “Trading Estate”. Business Parks accommodate primarily company offices and light industrial premises in specifically designated and landscaped environments (see Collins Dictionary and others).
- The layout is poor, resulting in congestion of buildings, seas of unrelieved hard-surfacing, no coherent provision for outdoor storage, no incorporation of meaningful green spaces and rest areas for employees.
- Both architect and landscape architect refer to the proposed buildings as or “agricultural style buildings” to give some belief of a romantic, rural, idyll - whereas the buildings are big, modern, steel framed, metal clad, shallow roof pitch boxes that accord with standard industrial scale buildings and do not have any characteristics of traditional agricultural buildings. As such they are not in keeping with the rural building character of the area in scale, size, form or colouring.
- There are no detailed landscape proposals for within the estate and the applicant wishes to defer any such submission until after approval. This is a wholly unfortunate approach where landscape is such a critical element in this scheme. From the limited information given it appears however that little planting is proposed or capable of being provided to ameliorate and soften the hard crude forms of the buildings and the “acres” of unrelieved hardstandings, nor provide any effective boundary planting to shield the buildings including views from Stone Street.

In conclusion any development of this nature should contribute to and enhance the natural and local environment, encourage the effective use of land, be focused in locations which are or can offer genuine modes of sustainable transport, be visually attractive and add to the local character as a result of good architecture, layout and effective landscaping. These are all important requirements set out in the Revised NPPF which, amongst other updates, has increased emphasis on sustainability of locations and good design. This scheme fails to meet many of these aspirations and particularly the economic, social and environmental objectives set out in paragraph 8 of the Revised NPPF.

It is therefore requested that the Council refuse the application

Yours faithfully,

*R. Fletcher*

Richard Fletcher  
Lead for the Environment and Planning Group of Hadleigh Society  
(see postscript overleaf on page 6)

**Postscript**

Further to the Society's letter of the 26 July 2018 concerning the extent of the application site and ownership of the site; having checked with Land Registry it is found that the bulk of the application site (in Title Number SK219168) appears to have been owned, since 27 March 2018, by SLA Property Company Limited (Co. Regn. No. 01203396) of 153 Princes Street, Ipswich, IP1 1QJ. The applicant, G A Imports, does not appear to be registered on that Title and thus, if correct, it is difficult to understand why an Ownership Certificate A, dated 15 May 2018, was submitted stating the applicant G A Imports was the sole owner of the application site.