

# Public Consultation Responses for delegated planning items



## MAY 2020

<b>Report to</b>	Director of Planning
<b>Report reference</b>	Report PCI9/20-53
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<b>By</b>	Development Management Lead
<b>Application reference</b>	SDNP/19/03768/FUL
<b>Site address</b>	Iford Farm, The Street, Iford, East Sussex
<b>Application description</b>	Consolidation of Iford Estate Farming Operations to include the construction of agricultural buildings (for housing of livestock, grain handling and storage), a silage Clamp and new access road from Piddinghoe Road.

### Recommendation:

That planning permission be granted subject to:

- (i) The conditions set out in paragraph 10.1 of the report; and
- (ii) The completion of a section 106 agreement which secures the transfer of land of 1.9km in length (approx.) to the north west of the site running adjacent to the river Ouse, to the SDNPA in order for future enhancements to the Egrets Way to be delivered. The final form of which is delegated to the Director of Planning

### The following responses were received by members of the public:

Name	Comments
Peter Earl 14/5/20	I wish to raise a strong objection to this development proposal. If allowed here and repeated throughout the National Park it will change the character of the landscape. The cumulative impact from the redevelopment of all the redundant buildings/sites has not been taken into account and with their likely use for business or residential purposes will transfer employment from towns to the countryside with the consequent additional traffic movements and activity. This needs to be the subject of an Environmental Impact assessment. I have also noted that the proposals involve the importation of substantial amounts of waste material to form a large level platform for the extensive yard and new buildings (possibly as much as 100,000tonnes). This is casually referred to on page 39 of the Design and Access Statement, but nowhere

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	<p>in the submission is there any reference to the volume of material involved or the extensive number of HGV lorry movements that this will require. In addition, substantial volumes of soils are required to form landscape banking and the proposed silage clamps. There is no mention of this significant activity within the officers delegated report or in the highway authority comments which I consider to be a major omission.</p> <p>The SDNPA will be aware that the previous development of the farm site, which similarly gave rise to the unnecessary large scale importation of waste, drew much criticism and anger from the local community, particularly because of the intensive HGV traffic this involved along the C7, the conflict with cyclists using the established cycle route and the damage caused to listed buildings within the town of Lewes Conservation Area. The large increase in HGV movements this activity will involve over a two year period is incompatible with the status of the road where HGV traffic is prohibited (except for access), and the intended continued use of the C7 for cycling, particularly given any timescale to deliver the completion of the Egrets Way. The development conflicts with the SDNPA duty to foster the wellbeing of the Ouse valley community and the objectives of 'The C7 a Gateway to the South Downs National Park.</p> <p>There is no reference within the heritage statement or highways and access assessment to the waste importation and the impacts on the town of Lewes conservation area. It is unclear how the raising of land within a zone 3 flood risk area does not add to the risk of flooding elsewhere within the Ouse Valley, particularly in the absence of a volume assessment of the intended raising of land from 1.83m AOD to 5.3m AOD. The Environment Agency assessment of this element of the development makes no reference to waste importation and it is apparent that this too has not been considered.</p>
<p>Victor S lent, MSc., South Downs Society</p>	<p>This application should be deferred:</p> <p>The Agricultural Justification reveals there are over 21 existing buildings. It provides many statistics as to what the NEW buildings will be used for but is evasive on what <u>agricultural use</u> the existing buildings will be used for. Clarification must be sought on their future use. Rough estimates show the land area, collectively, f these old buildings amount to the size of a small village!</p> <p>Policy SD39 e) requires an applicant to consider "The development re-uses or replaces existing buildings where feasible" No attempt has been made to undertake a feasibility audit. The Agricultural Justification just lists a series of difficulties including the lack of a WC for staff! The sizes of the existing buildings are not documented and worryingly the Justification talks about residential development at Swanborough by way of justifying the need for new agricultural buildings! The Justification says that there would be difficulties at Swanborough in retaining the</p>

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	<p>cattle as there is no fence! Why doesn't the farm erect a fence? – they don't need planning permission for that!</p> <p>The Justification continues “The farming operations conflict with commercial uses on site..”! Surely this application is about agriculture and not to support the farm's commercial operations? Worryingly, as shown in aerial pictures submitted, Swanborough seems to have a large number of cars parked up. Bearing in mind there are only 6 staff one wonders why there are so many cars.</p> <p>Policy SD39 a) says development will be permitted where: “....scale is commensurate with that need;” The Agricultural Justification provides no evidence as to why this large site is required. No comparison has been made with other farms of a similar size anywhere in the country or in any other national park. A 10 acre concrete ‘processing area’ (near 6 football pitches) including some existing buildings + those given permission in 2012 of over 2000 m<sup>2</sup> + new buildings amounting of over 4,500 m<sup>2</sup> seems excessive for a farm whose total acreage is only 3,700 acres.</p> <p>Policy SD39 b) says “.....available alternative sites, including where feasible sites <u>outside the National Park...</u>” No effort has been made to consider this. The application should be deferred until this policy has been addressed. [NB Newhaven has been recently designated as an Enterprise Zone and has extensive warehousing sites. It is only 5 miles away which is less than the distance between some of the farm’s landholdings.</p> <p>The Highways Report does not provide a comparison of existing vehicle movements as compared with future movements (once the buildings are complete). Why hasn't a TRICS forecast been submitted? Strikingly, the report shows no exports from the farm (grain, cattle and produce sales etc). Neither does the report show any imports to the farm. <b>It must be a very odd farm which has no exports or imports.</b> Surely the farm must sell its produce? Produce sales require vehicles to take produce away from the farm don't they!</p>
<p>Jeanne Peterson Clerk to Kingston Parish Council  <i>13/5/20</i></p>	<p>Kingston Parish Council would like to submit the following additional representation in regard to application SDNP/19/03768/FUL- Iford Farm, Iford:</p> <p>Kingston Parish Council wishes to object to the application on the grounds that there has been a lack of consultation with residents in villages along the Ouse valley. Implications of the Iford Farm Estate Plan affect not only Iford but also villages along the C7 who are already affected by the volume of traffic along the C7, which is a busy and poorly maintained road, used by cyclists and pedestrians as well as cars, vans and heavier vehicles. The officer’s report makes little reference to the traffic implications, and the traffic report is very unclear about the additional volume of traffic which will come along the C7 to Iford. It is likely that traffic from Houndene Farm will use the C324 through</p>

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	<p>Kingston from the A27. The C324 has height and width limits, as well as being meant for access only, and there is already concern from Kingston residents about volume and speed, especially past the village school.</p>
<p>Jane Symonds 13/5/20</p>	<p>Dear Mr Slaney and Members of the SDNP Planning Committee,</p> <p>I have re-examined this planning application and read some of the significant number of issues raised by concerned parties. I too share many of those concerns and think that the planning application should not be approved in its present form. Further information is required to support Iford Estate's application, in particular, more information on how this application and critically, the expansion of the Estate's non-agricultural operations across all sites will comply in detail with the planning authority's stated policies. In addition, am not satisfied with the Case Officer's response to my concerns regarding traffic to and from the new development and its impact on the amenity of the listed buildings/homes adjacent to the new development and therefore submit the following statement.</p> <p>Statement.</p> <p>Revised traffic data submitted by Iford Estate, and included in the 'Supplementary Highway Report'<sup>[1]</sup> indicates that the average number of vehicle movements per day to and from the proposed site will be 84. The Case Officer's (CO) report<sup>[2]</sup> makes no mention of these revised figures and no quantified assessment of the impact of the farm consolidation and resulting intensification of operations (particularly vehicle movements) at this particular site. This report does not assess the number of potential vehicle movements at busy times of the year, such as harvest, to and from the site or the vehicle movements within the site. It is not clear whether the 84 vehicle movements (33 associated with the farm + 45 associated with the business units + 6 associated with the Game Farm) include the many daily deliveries and customer visits to the business units already operating at the site and could thus be an underestimate. Therefore, it is unclear how the CO can make an informed assessment of the impact on the amenity of the adjacent dwellings (see <a href="#">8:30</a>). I consider more accurate and independently verified traffic data is required and, most critically, a clearer plan for how these vehicle movements will be managed on the site.</p> <p>I am particularly concerned about the CO's response to the 'cut way' or cut-through that runs next to my home. I requested a condition be included that this cut-through be blocked off, but the officer states "it is not considered that this would meet the tests of necessity and reasonableness of planning conditions or that can be directly related to the development proposed" (see <a href="#">8:31</a>). Without independently assessed figures for vehicle movements and restrictions applied to using the cut-through how can the CO be sure that the development will not meet one of the main issues of consideration stated in the report, that the development will not "Impact on Surrounding Residential Amenities".</p> <p>THE SDNP Local Plan SD05 states that the National Park must "Have</p>

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	<p>regard to avoiding harmful impact upon, or from, any surrounding uses and amenities”<sup>[3]</sup>ensuring that it is a place where people want to live. The revised figures submitted by the Estate indicate that there will be a large number of (average) vehicle movements which will inevitably be higher at busy times in the farming calendar which will have a huge impact on our quality of life as every vehicle that passes can be heard from within the house. I am surprised that I was not contacted directly by the CO to discuss the matter in detail, particularly after being let down by Lewes District Council due to their recent ‘administrative error’ which allowed the change of use of the barn right next to my home to go ahead without the scrutiny of the planning application requested by LDC. I urge the SDNP Planning Committee to look at this issue again and to consider blocking or restricting this cut-through to emergency use only.</p> <p>Finally, I think it is vital that, prior to making a decision, all members of the Planning Committee visit Iford Village, the proposed consolidated farm site and areas overlooking the site and request further data, in order for an informed decision to be made in relation to the points I and other concerned parties have made.</p>
<p>Jennifer Chibnall (Dr) 13/5/20</p>	<p>This objection relates to the observation in the officer’s report concerning <i>Strategic Policy SD15: Conservation Areas</i>:</p> <p><i>Within Conservation Areas, development proposals will only be permitted where they preserve or enhance the special and historic architectural interest and appearance of the Conservation Area.</i></p> <p>While there is a case for consolidation of these farms it is not clear why this site, adjoining a conservation area, indeed partly encroaching on it, was chosen for such a large scale development which, with its large new sheds, will cover an area much the same as the village itself and be clearly visible from the South Downs Way. The development is argued to ‘enhance’ the Conservation Area because the new track will remove traffic but most of the traffic will be newly generated by the development itself. So the new track is basically merely mitigating adverse effects of the development to ‘preserve’ the Iford Conservation Area.</p> <p>Part of the C7 is included in the CA but as the nature of the traffic generated it not made clear possible harm is impossible to assess. Importantly, harm that might be caused to the Lewes Conservation Area has apparently been ignored by the case officer and the Conservation Officer in this analysis.</p> <p>The traffic data is without any detail so too is the exact nature of the work that will be done on the new site. Will all the cattle be held on this stabling? How often will they be driven to and fro? Will they be bought in and reared intensively and then exported? Either way it appears large vehicles may be used to drive from other landholdings or elsewhere in the National Park and with fodder and grain for drying operations. No</p>

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	<p>route restrictions are required here and large cattle and other lorries could be routed via Lewes, through the Conservation Area and in particular expected to negotiate the hairpin bend by the historic Swan Inn. If this was the case, weight restriction would need to be applied. I believe vibration from heavy vehicles has caused significant damage to buildings in other parts of the town.</p> <p>As this development lies partially within the Iford Conservation Policy SD15 requires that buildings should not have an adverse affect on the CA and should respect the reasons for which it was made – the preservation of the small scale buildings of traditional materials. This should be at the least effected by screening the development from the adjacent listed buildings. Removing the modern “storage” shed adjacent to the listed brick and flint buildings of the original steading would ‘enhance’ the Conservation Area by separating them from the modern farm sheds and reconnecting them visually with the village. It is also not clear where the slurry/manure from the intensive rearing activity will be located. The adjacent concrete area is labelled “open storage for farm vehicles” but the rationale for the sheds includes machinery storage. This should be screened. A belt of trees should be required.</p> <p>It should also be noted that recent developments have ignored the views in the Conservation Area appraisal that should have remained open, along the footpath. Distant views of the new sheds from the South Downs Way should also be considered and unobtrusive colours used in roofing etc. to mitigate the effect of their scale.</p>
<p>Neville Harrison Chair Egrets Way Trustees and Committee  13 May 2020</p>	<p><b>Submission on behalf of the Egrets Way Project Committee</b></p> <p>Due to a potential conflict of interest this submission does not express a view on the recommendation; our comments relate specifically to the references in the report to the Egrets Way.</p> <p>Whilst welcoming a proposed condition (10.28) intended to benefit the Egrets Way we believe that there may have been some confusion between the Sussex Ouse Valley Way (SOVW) , and the Ouse Valley Cycle Network (OVCN), the original name for the Egrets Way. We now use the name Egrets Way as it better reflects our aim of creating a shared path linking Lewes and Newhaven by a route that largely follows the river.</p> <p>There are also extensive links to local communities and to other paths.</p> <p>The SOVW is a well-established 42-mile-long path that traces the River Ouse from its source in West Sussex, to the sea at Seaford. It crosses Iford Estate land on the footpath (RoW) that runs on top of the river bank. The planned section of the Egrets Way route connecting Lewes and Newhaven also follows the river but runs below the river bank. Although none of this section of the Egrets Way has as yet been constructed on the Estate, it will be similar in surfacing and landscaping to that already constructed between Southease and Piddinghoe.</p>

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	<p>The Planning Report (para 8.40) proposes that the SOVW is upgraded to a bridleway to allow ‘better access for cyclists’, whilst acknowledging that the proposed section of the Egrets Way ‘is adjacent to it’. However we question whether this proposal is either achievable or desirable as the river bank here is narrow, in places no more than a metre wide, so could not accommodate a bridleway and the route would end at the southern boundary of the Iford Estate leaving users (apart from walkers) with no ongoing path. Furthermore, we think it unlikely that the Environment Agency, which is responsible for maintenance of the river bank, would give permission for bridleway status, or even a licensed cycle path, as we have explored those options with them in the past.</p> <p>Whilst we welcome the intention of progressing the Egrets Way it seems unlikely that Condition 10.28 would help to achieve this. We already have funding in place to deliver the section of the Egrets Way from Newhaven to Piddinghoe with construction planned to start later this year. And we currently have applications pending for funding to construct the remaining river side route, the bulk of which is on Iford Estate land. It would be of real benefit to the project if there were to be a condition for the Estate to commit to working with the NPA to develop the detailed engineering specification for that section of Egrets Way adjacent to the river on their land, and to contribute a sum towards this work.</p>
<p><i>Elizabeth Thomas</i> 13/5/20</p>	<p>My further Objection is to the way in which the key Development Management Policy, SD 39 has been applied.</p> <p>To comply with policy SD39a) and SD39b), I would expect an analysis as to why this particular holding has been chosen for an agro-industrial complex, much of which appears to be unrelated to the operations on this particular farm unit, and generating HGV traffic on a narrow C class road next to a tiny historic village, without the pros and cons of alternative sites being considered as part of this application. For example, on paper, a site on the A26 with immediate links to the A27 would be a much better theoretical location.</p> <p>The WEP does refer to consolidation of operations on one site but does not explain the rationale as to why <u>this</u> farm location, as required by policy SD39, has been selected. Here it will result in a development with a footprint the same size as the village it adjoins.</p> <p>This site, as your officer points out, is outside the settlement boundary, in a “flat open and undeveloped” and “highly visible” valley floor, in a location that would never be chosen as a site for new industrial estate. It is the size of the village and includes part of its Conservation Area.</p> <p>SD39c) and SD39d) do not appear to have been fully addressed. The sheds are not in keeping with the character of the original farm. It is astonishing that a design of large sheds, with white or light coloured roofs is not discussed. Dark colours are recessive and waiting for lichen</p>

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	<p>to grow is a long game, probably outlasting the economic life of these structures! The distant views should be protected by a screen of trees, including evergreens adjacent to the “vehicle storage area”, non reflective glazing and black non reflective solar panels (without the aluminium trim) and dark roofing employed.</p> <p>e) – and f) the large open cattle over wintering barn is now to be used for unrelated industrial B1 or B8, to accord with policy, it should be cleared to enhance the setting of the listed buildings and a screening planting agreed with adjacent occupiers. Presumably B2 is not permitted so close to housing? B8 storage use depends very much on what is stored. Scaffolding poles and noisy items being moved at unsocial hours need proper regulation.</p> <p>Paragraph 3.4 of the report refers to land raising. This site is in Ouse Flood Zone 3. Does that make it a suitable site for intensive animal rearing, with storage of manure and slurry? This is not addressed by this application. Is flooding the reason for the land raising? If demolition material is to be imported then a condition should be attached to ensure it is clean crushed brick/aggregate/chalk to prevent water pollution. Some building waste appears to have already been used and given the reference in the WEP to asbestos in old buildings, this should be assessed and conditioned.</p>
<p>Susan Thompson 13/5/20</p>	<p><b>OBJECTION to SDNP/19/03768/FUL</b></p> <p>The SDNPA should not be considering this controversial planning application in the way currently planned - with Tim Slaney alone making the decision. Other National Parks including North Yorks and Cairngorms are ensuring transparency and scrutiny during the pandemic? This plan deserves better attention.</p> <p><b>The SDNPA Whole Estate Plan process:</b> is unfit for purpose. The Iford WEP group were not obliged to consult local residents. Consultation of the Ouse valley community was minimal. Who are the members of this distant SDNPA/WEP group making decisions for my community?</p> <p>Consultation of the Ouse valley community affected by the WEP and this application was atrocious The WEP process should be reviewed to require commitment to wider community consultation.</p> <p>The unrepresentative Iford Estate WEP and this plan must be reviewed and resubmitted.</p> <p><b>The Ecosystem approach:</b> As a Lewes Neighbourhood plan steering group member I helped to pioneer the ecosystem approach to planning which considers the “bigger picture ” - the wider environmental implications of development that is now SDNPA policy. This holistic approach also values the social and community wellbeing derived from local involvement in planning. This planning application for the consolidation of all estate farms should be redrafted to include the full</p>



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	<p>social, economic and environmental impact of ALL Iford estate plans for industrial and residential development of new and redundant farm buildings and also allow for wider community input.</p> <p><b>C7 Concerns:</b> An independent Traffic Report should consider any potential for increased noise, light and air pollution, as this plan was apparently prepared using estate calculations. This information should be clearly outlined in a redrafted plan. Any significant changes to this rural road should reflect recent POLO (Parishes of the Lower Ouse) plans for the C7 based on the SDNPA/ Hamilton-Baillie Rural Roads report especially in relation to the signage clutter and road markings.</p> <p><b>Environmental Impact:</b> The monstrosity proposed is at a gateway to the South Downs National Park, on an Avenue Verte connection to Europe in the heart of the beautiful Ouse Valley. This industrial scale development is an ugly blot in a beautiful unspoilt landscape, an unmodulated expanse of huge white industrial sheds and concrete doubling the size of a Conservation village when viewed from the South Downs way. It fails to conserve and enhance - it wrecks and degrades.</p> <p><b>Sustainable Tourism:</b> This industrial scale consolidation is incompatible with SDNPA/Iford estate efforts to promote sustainable tourism in the Ouse valley including recent diversification into luxury holiday lodges - it's best not to kill the goose that lays the golden egg?</p> <p><b>Egrets Way mitigation:</b> Any resubmitted application should include Iford estate commitment to ALL aspects of Egrets Way development on estate land for a coherent link between Newhaven and Lewes with properly joined up village connections - so it can be enforced by the SDNPA.</p> <p>I am a founder trustee of the Egrets Way project but my personal objection is made as a long term resident of Swanborough in the parish of Iford. I look forward to contributing to and eventually supporting a more enlightened Iford development plan in future.</p>
<p>Chris Baines-Holmes Friends of the South Downs 12/5/20</p>	<p>Some 20,000 walkers, cyclists and riders complete the South Downs Way (SDW) every year. Many thousands more use the route between Kingston and Southease specifically because it follows the edge of the escarpment, giving outstanding views across the flat valley to the north east and onwards to Mount Caburn. Public access to each end of this section of the SDW is convenient. The historic and characterful town of Lewes is nearby. The route of some five miles is within the capabilities of most reasonably fit people. The combination of these features makes the Kingston/Southeast section of the SDW a popular and much appreciated local facility. The popularity of walking as a leisure activity is growing and will probably increase further when the Covid-19 restrictions are lifted.</p> <p>The current buildings at Iford farm intrude upon this rural scene like the proverbial sore thumb. The buildings, including the roofs, are of an</p>

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	<p>unsympathetic and very visible colour. The contrast of the solar panels on the roof of the largest barn tend to draw the eye rather than alleviate the paleness of the roof panels. The extent of the intrusion can be seen in document Photo Viewpoint 1200011, provided by the applicant.</p> <p>If this application is granted the planning committee must require that the new buildings be constructed of materials of a dark recessive colour and that any solar panels added to the roofs should be fitted with anti-reflective glass (up to 30% more efficient) and dark frames.</p> <p>The provision of additional tree cover around the site is unlikely to improve the view from the SDW for many years, if at all.</p> <p>In view of the number of objections raised and the importance of this application I feel that no decision should be made until the full planning committee can be re-convened, either electronically or in person.</p> <p>Allowing this application will be in direct contravention of one of the statutory purposes of the National Park – <i>to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</i></p>
<p>Imogen Makepeace 12/5/20</p>	<p>Iford Estates is a modern arable and livestock unit of 15,000 hectares of land. This is high technology, intensive agriculture with some greening at the edges.</p> <p>UK agricultural policy is undergoing a reform, as a result of Brexit and the need to mitigate Climate Change.</p> <p>The Food and Agriculture Organisation of the UN, UK Government, and the Committee on Climate Change are emphasising the need for reduction in high tech, low cost intensive agricultural practices.</p> <p>Brexit will bring a policy of “public money for public goods”. It’s important to recognise that public goods are soil health, water quality, air quality, biodiversity, climate change mitigation, beauty, heritage and the natural environment.</p> <p>These values are reflected in SDNPA’s own Policies</p> <p><b>SDNP PMP 13</b></p> <p><b>Support the financial viability of farm businesses through appropriate infrastructure and diversification developments, in particular encouraging those that support sustainable farming.</b></p> <p>and in the <b>National Planning Policy Framework 15</b></p> <p><b>Conserving and enhancing the natural environment</b></p> <p><b>170. Planning policies and decisions should contribute to and enhance the natural and local environment by:</b></p> <p><b>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land</b></p>

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	<p>instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and</p> <p><b>172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks</b></p> <p>Committee on Climate Change is clear in its report of January 2020: <i>Land use: Policies for a Net Zero UK</i></p> <p>Policies must</p> <ul style="list-style-type: none"><li>• Encourage low-carbon farming practices – such as ‘controlled-release’ fertilisers, improving livestock health and slurry acidification.</li></ul> <p>Government recommendation is for 89% reduction in beef consumption, the emphasis is on quality rather than quantity, with 100% grass fed and out-of-doors reared livestock being the goal.</p> <p>In SDNPA Partnership Management Plan 2020-2025, Outcome 1.1 states “The South Downs National Park Authority will continue to develop groundbreaking evidence and understanding about the landscape and natural beauty of the National Park in order to effectively predict, manage and monitor threats from a range of issues such as climate change, agricultural methods, development and recreational pressures.”</p> <p>Farming and Agriculture Organisation of the UN observes “ the last half century has witnessed striking increases in global food production through intensive use of inputs , such practices may deplete natural resources and impair the ability of agro-ecosystems to sustain production into the future”</p> <p>It is disappointing that although all sources of information and policy seem to point towards a need for the balance to be less intensity and more sustainable, SDNPA may allow Iford Estates to resist critical reform.</p>
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