

# Joint Letter from: Easton, Marlingford & Colton Parish Councils

Mr Rooke  
Broadland District Council  
Planning Department  
Thorpe Lodge,  
1 Yarmouth Road,  
Norwich, NR7 0DU

16 August 2018

Dear Mr. Rooke,

Food Hub, Honingham: LDO 20170052 and Planning Applications - 20181090;  
20181177; 20181294

We would be grateful for immediate clarification on the three active applications and how each relates to the others.

Planning application 20181090 relates to a request for a Screening Opinion which you failed to answer within the prescribed statutory 21 days. The applicant did not seek a Screening Direction as its prerogative, but submitted a limited EIA under subsequent application 20181294. We therefore assume, that as 20181090 is now time barred, it is in fact withdrawn by default and subsequent actions of the applicant. Your planning register remains out of date as the application is still stated as "registered". Please confirm or advise if different to our assumptions.

Planning application 20181177 relates to discharge of conditions 2.20 and 2.21 of the LDO. The submission covered by the e-mail from James Alston notes that 3 of the six conditions are stated as confirmed or determined by highway engineers as not necessary at this time. Please advise whether this is the opinion of the applicant's advisers or the Highways Authority. If the latter, we would appreciate details on why the original opinion has been overturned.

It is assumed that condition 2.20 requires agreement of all works necessary for a fully developed 19 hectare site. Any phasing of these works should be considered under condition 2.21.

Agreement to the designs for these conditions rests with Broadland and NCC as the Highways Authority. Our parish councils are concerned that the numerous technical questions it and other bodies have raised are being taken in to account and we would appreciate advice on how these are being considered.

Contact details:

Julian Blackmore, Tel: 01603 881426 Email: julian.blackmore@btinternet.com  
Peter Milliken, Tel: 01603 881035 Email: chair@eastonparishcouncil

Planning application 20181294 submitted on behalf of a company who is not the LDO developer and relates to a Milling Plant within part of the LDO. It is appreciated that the reason a separate application is necessary is due to the layout is in breach of one of the design conditions, namely the height restriction. This raises several questions for which we seek guidance:

Presumably as the conditions of the LDO were approved by Council, any change or permitted exception creating a precedent for the remainder of the LDO will have to be considered by Council and not officers.

As noted above, an EIA accompanies the application relating to changes in landscaping issues only, relying on the Screening Opinion within the LDO for all other environmental issues. The scope of the development has changed since the 2017 Screening Opinion as demonstrated by 100 acre Food Enterprise Park development advertised by the developer. Please confirm whether you have taken legal advice on whether this can be treated as an amendment to the 2014 EIA Regulations or whether a complete new Screening Opinion under the 2017 Regulations needs to be determined.

The environmental statement also anticipates a screening statement related to the Habitat Regulations. Can you confirm the Council's intention to prepare an HRA screening.

The application is specific to those buildings and structures which exceed the 10m height restriction. We are intrigued how this will work in practice for a third party to be seeking planning permission for a minority part of its proposed development. One's mind boggles at the extent of conditions which will have to apply as both these selected structures and the rest of the Milling Plant site are dependent on discharge of all conditions of the LDO. The process seems overly complicated and we would appreciate advice why this method has been adopted.

We are concerned that if the exception is granted for the Milling Plant it will set a precedent for exceptions on the remainder of the LDO. Is there a mechanism by which this can be prevented?

The application has detailed design proposals for the remainder of the Milling Plant site which is stated as for information only. These details are all dependent on the road design, drainage provisions, landscaping etc for the whole LDO site and are meaningless until these have all been agreed.

One of the "for information" drawings shows Acid Water from the Mint section of the main building. Please confirm whether this has been considered for waste discharges within the LDO as it is excluded from this application.

We assume that the developer is advising Broadland of development proposals for the whole site and we do not see why this should not be made public.

It seems sensible that the masterplan is prepared before any development is considered to ensure fundamental issues such as drains set to fall in the correct direction to agreed outlets and connections, reflecting adequate pipe sizing for progressive accumulations.

We have serious concerns that the apparent lack of site planning and the piecemeal progression will lead to mistakes, a haphazard layout and under-capacity site infrastructure.

We look forward to receiving the answers to our questions in the very near future.

Yours sincerely



Cllr Julian Blackmore

Chair Marlingford and Colton Parish Council



Cllr Peter Milliken

Chair Easton Parish Council