

Executive Summary

This letter of objection concerns application 20/00594/FUL for a food storage and distribution facility and associated development on land adjoining Ipswich Road and Wick Lane in Ardleigh, Essex.

Planning Direct has been instructed to produce this letter on behalf of Ardleigh Parish Council. The application site concerns land located within Ardleigh Parish.

The application comprises a major development that would represent a significant departure from the recently adopted development plan. Other material planning considerations are also considered to weigh firmly in favour of its refusal.

The Parish Council's main grounds of objection - addressed in detail under the relevant subheadings of this letter - can be summarised as follows:

1. The development would have a substantial detrimental impact on planned Public Open Space (per approved application ESS/57/04/TEN) due to be located in very close proximity of the site. The notable effect of the development on this planned Public Open Space has not been taken into any consideration by the applicant;
2. The development represents a very significant departure from the development plan. All of the material planning considerations advanced by the applicant would apply in equal or greater measure if the development were relocated such that it did accord with the development plan. Accordingly, these alleged material planning considerations provide no justification for the proposed departure from the development plan;
3. The major employment and transport-related development would be sited in an unsustainable location, where it would contribute to a highly unsustainable pattern of growth and movement, cause significant detriment to the proper functioning of the rural road network and result in a substantial increase in private car movements and reliance on private car use. The lack of a Travel Plan is also objected;
4. The application contains insufficient detail and clarity to enable its impacts (and potential dis/benefits) on local employment and the economy to be properly assessed;
5. The applicant's assertion that the development would assist to tackle a number of

Tendring's social and economic issues is unfounded. In fact, due to its proposed location far away from the communities that would benefit from its construction, the development is considered to exacerbate these local issues;

6. The development would entail the permanent loss of productive, best and most versatile agricultural land for which no compelling justification has been provided. The applicant vastly understates the social, economic and environmental (including landscape) harm associated with the proposed permanent loss of the affected agricultural land parcel;
7. The applicant has failed - by a considerable margin - to justify their claim that there are no other suitable sites available anywhere in the district or wider region. As a minimum, the Parish Council considers that vacant or otherwise available industrial/employment/brownfield sites in sub/urban settlements at the highest tiers of the Settlement Hierarchy should have been considered in advance of this working agricultural field in deeply rural Ardleigh. The application as submitted provides no indication or evidence that this exercise has been conducted;
8. The development would cause substantial and permanent harm to the character, appearance and integrity of the affected rural landscape. It would feature prominently in various sensitive views. The LVIA accompanying the application vastly undervalues both the site and the local landscape character whilst similarly understating the practical landscape effect of the development which would be significant;
9. The "in principle" harm of the development to local landscape character - arising from the inappropriate type and scale of the development in its rural context - is further exacerbated by its stark and incongruous urban design and materials;
10. As it stands, the application contains a lack of information and certainty concerning its impacts on ecology and biodiversity. In the absence of this information, it must be assessed that the development would cause net harm to biodiversity and ecology, including material and unlawful harm to certain wildlife species (including bats);
11. The application falls far short of assessing the likely impact on the significance of surrounding listed buildings. Contrary to the applicant's stance, heritage significance does not derive only from views. The development would cause serious disruption to the long-preserved shared rural setting of the listed buildings which are significant - in part - because of what they contribute to their rural surroundings. This comprises a

firm - albeit likely less than substantial - heritage harm that must be weighed in the planning balance;

12. The relocation of this major industrial employment site from a dedicated industrial estate in a sustainable part of Harwich with an overriding industrial character to a working and high quality agricultural field on the rural outskirts of Ardleigh would - contrary to the applicant's assertion - comprise a net amenity harm;
13. The Air Quality Assessment accompanying the application fails to consider the likely significant impacts on both the existing PRow and the planned Public Open Space to south of the site. Its findings are also dependent on the implementation of a Travel Plan which has not been provided and which the Parish Council disputes is achievable;
14. The Noise Assessment accompanying the application fails to consider the likely significant impacts on both the existing PRow and the planned Public Open Space to south of the site. Its findings are also predicated on a significant underestimation of vehicle numbers;
15. The application site is located in an area with known drainage issues and insufficient information is provided concerning how water run-off from the site would be appropriately dealt with. As it stands, it is assessed that the development would unduly exacerbate local drainage problems; and
16. Although the applicant suggests that the previously proposed "Phase 2" part of the application would no longer be pursued, the Parish Council has legitimate concerns that this is not the case. The Parish Council is similarly concerned that, if permission for this large application which stands in firm conflict with various important development plan policies is forthcoming, it would be very difficult for the District Council to resist its future expansion.

