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For and on behalf of
Princes Ltd

PLANNING STATEMENT

**Raw Material Handling & Kitchen Facility
Princes Ltd, Bridge Road, Long Sutton**

Prepared by
DLP Planning Ltd

September 2018

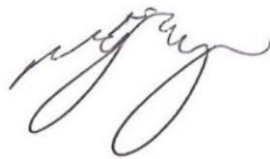
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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DLP Planning Ltd (DLP) on behalf of Princes Ltd in support of the application for planning permission for the development of a new Raw Material Handling & Kitchen facility and associated works at the site at Bridge Road, Long Sutton. The Statement will demonstrate that in planning terms, the development proposal for an expansion of the facility is acceptable.

Scope and Content

1.2 This Planning Statement is set out to:

- Describe the site, location and relevant background information in Section 2;
- Describe the application proposal in Section 3;
- Outline the relevant planning history and development cues in Section 4;
- Review the relevant national and local planning policies in Section 5;
- Assess the other material considerations in Section 6; and
- Conclude the planning case for the application proposals in Section 7.

1.3 Further details of the proposed development are set out within this report and the accompanying documents:

- Plans and drawings (Bond Bryan Architects);
- Design and Access Statement (Bond Bryan Architects);
- Flood Risk Assessment including Drainage Assessment (Waterman Ltd);
- Indicative Drainage Strategy (Waterman Ltd);
- Site Investigation Phase I and II (Solmek Ltd);
- Ecological Impact Assessment (Waterman Ltd);
- Sustainability Statement (Darnton);
- Statement of Community Involvement (DLP);
- Transport Statement (Waterman Ltd);
- Draft Travel Plan (Waterman Ltd);
- Noise Impact Assessment (Waterman Ltd);
- Light Assessment (Darnton);
- Baseline Air Quality Assessment (REC Ltd); and
- Qualitative Odour Assessment (REC Ltd).

2.0 THE APPLICATION SITE

Site Description

- 2.1 The application site comprises land owned by the Applicant who operates the existing Princes premises at Bridge Road, Long Sutton. This site is Princes largest food production site and produces a range of canned products including baked beans, vegetables, fruit, pulses and pasta. The location offers ease of access to local producers and suppliers as well as good connectivity to the A17.
- 2.2 The Princes facility at Long Sutton is approximately 13.2ha in size and is densely populated with various industrial buildings used for food production and operations of the site. The application site itself comprises two portions of land, red lined in the accompanying site plan and shown as an extract at Figure 2 of this Statement and measures approximately 5.03ha.
- 2.3 The existing built form at the site is located centrally and forms a series of large buildings used for canning, packaging, warehousing, offices and welfare facilities.
- 2.4 To the eastern side of the site an area of grassland and a bungalow which has remained vacant for several years, to the south of this is a water treatment works and an area of scrubland. The main area of employee car parking is located between the main mass of buildings and the grassland to the east.
- 2.5 To the west of the main group of industrial buildings, Hundreds Lane splits a portion of the site apart from the main facility. This western portion of the site is predominately hardstanding used for deliveries and storage of pallets. Security portacabins are located at the entrance to this area, with another portacabin building located in the middle of the site. A wire fence surrounds this area of hardstanding. An area of semi-improved grassland is located to the west of this which is also under the ownership of Princes Ltd.
- 2.6 Access to the site is readily available and can be achieved via several points along Bridge Road. This provides access for staff to the car parking to the east as well as the visitors car parking to the front of the office buildings. Deliveries to the site enter from the access point at Hundreds Lane and continue through the site on a one way system.
- 2.7 The site lies within Flood Zone 3, as does the vast majority of the surrounding area as

demonstrated on the flood map extract provided at Figure 1. A Flood Risk Assessment accompanies the planning application.

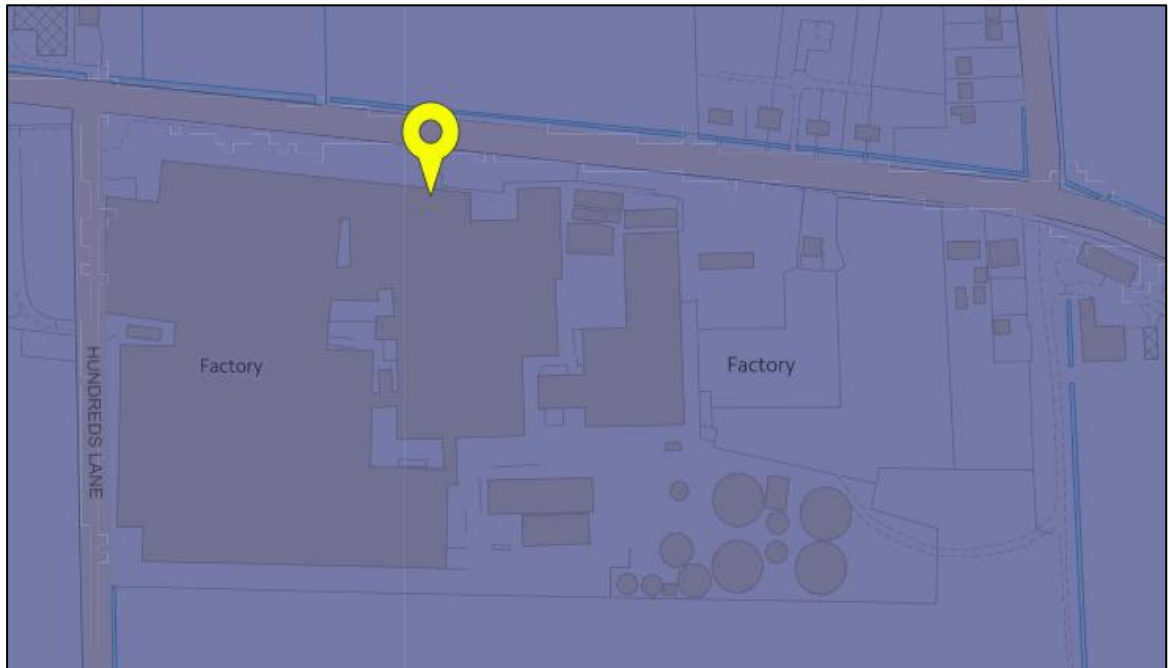


Fig 1: Extract from the Environment Agency's Flood Risk Map

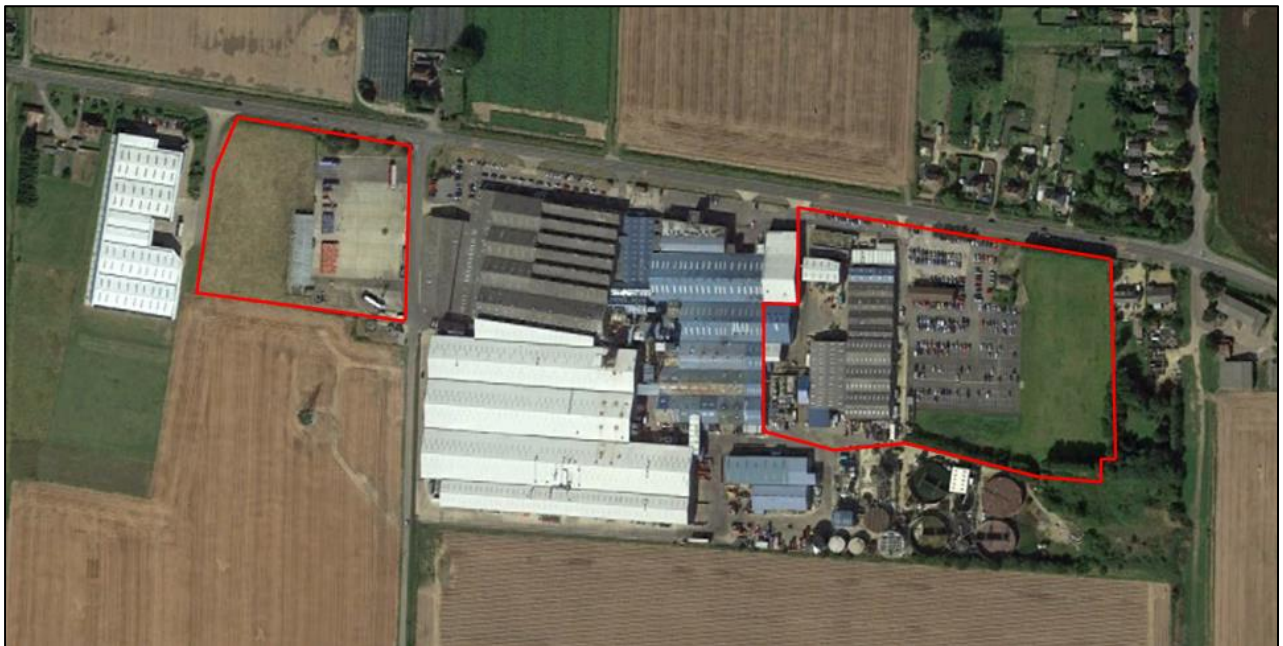


Fig 2: Aerial view of the application site

Context

- 2.8 The current proposal represents the largest investment to date in the site. This is a strategic investment to further strengthen the business's place in the market and to secure the future of the plant.
- 2.9 The production plant supports 498 permanent employees with a further seasonal peak of agency staff at around 114. Those seasonal agency staff work full time as part of the shift patterns albeit on short term seasonal peaks. The company is a major employer for the area making a considerable contribution to the wider Lincolnshire economy.
- 2.10 With regards to the surrounding area, the application site is situated 1.9 km east of the town centre of Long Sutton and 19 km west of the town of Kings Lynn.
- 2.11 Built form varies greatly along Bridge Road with numerous industrial and agricultural units dispersed along the road, as well as various residential properties integrated into the mix.
- 2.12 There is a mix of styles in respect of the residential properties, ranging from post war semi-detached housing to farmhouses, single storey bungalows and a development of six earth sheltered dwellings at Unity Gardens. There are a group of properties directly opposite the eastern proportion of the application site including 1 – 8 Bridge Road. Directly abutting the application site is 144 Bridge Road beyond which are other residential properties which form a small cluster of properties on the southern portion of Hospital Drive. There is a larger number of residential properties which forms a ribbon development along the portion of Hospital Drive north of the junction with Bridge Road.
- 2.13 To the immediate north and south of the Princess site is open countryside and agricultural land. In the southern field there is wind turbine which measures some 53m in height.
- 2.14 In respect to accessibility, there is a bus stop directly outside of the site on Bridge Road. The Stagecoach 505 Interconnect service provides two buses every 30 minutes to the following nearby settlements.
- Spalding – Holbeach – Gedney – Long Sutton – Sutton Bridge – Kings Lynn



Fig 3: View from east of Car Park and proposed buildings to be demolished and View from North of Car Park and Office building to be demolished

3.0 THE APPLICATION PROPOSAL

3.1 The application relates to the construction of a new (Use Class B2/B8) Raw Material Handling & Kitchen facility and associated works including infrastructure and parking in order to accommodate the incoming of ingredients, both in cold and ambient storage.

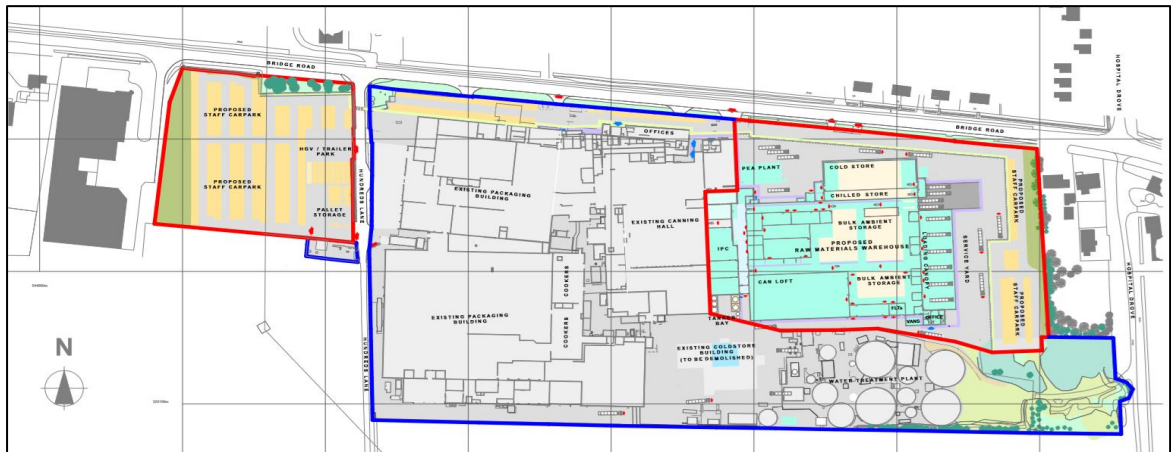


Fig 4: Proposed site plan

3.2 This facility is required by Princes Ltd to rationalise production lines, storage and processing areas and the associated built form to house such facilities. The on-site changes will vastly improve the efficiency of operations on site. This will result in the consolidation of a number of engineering workshops, stores, warehouse spaces and cold store warehouses into a large warehouse rather than dispersed across the site.

3.3 The new built form associated with the development will be predominately located to the eastern side of the site and will comprise:

- Raw Materials Warehouse,
- Bulk Ambient Storage,
- Chilled Store,
- Cold Store,
- Kitchen,
- Can Loft
- New loading bay with canopy.
- Relocation and reorientation of the existing pea plant; and
- Provision of new car parking to the west of the site.

- 3.4 An acoustic barrier of 3.5m shall be installed along the eastern perimeter of the new warehouse and an additional 2.5m acoustic barrier shall be installed along the eastern perimeter of the car park.
- 3.5 The nominal proposed top of parapet height for the warehouse is 20m externally. It is proposed to break up the massing of the main warehouse elements by applying profiled metal sheeting laid horizontally and within this to provide irregular bands of colour. Referencing back to the predominantly blue colour of the existing buildings it is proposed to use a pallet of blues / grey which will relate to natural sky colours. A dark shade at the base gives visual weight at eye level and grounds the building which then fades to light pastel colour progressing up the elevation. In this way, the treatment seeks to impose a horizontal emphasis to the elevations, with pale colour set against the sky. This device has been employed successfully elsewhere on Princes Ltd estate at Bradford where greys lessened the impact of an exposed valley side location.
- 3.6 The height of the warehouse proposal is driven by the requirement to provide clear spans at an optimum height to accommodate racking which achieves the anticipated storage volumes. This is based on 6 levels of racking which then determines the internal clear height.
- 3.7 There are to be two basic elements to the warehouse ambient storage and chilled / cold storage. These are arranged stacked north to south on the site between the constraints of the water treatment plant and the access roadway parallel to Bridge Road. Serviced from a shared yard area and maintaining the critical flow from east to west. Wrapped around these dominant masses are the ancillary loading canopies, offices, stair towers and air locks which service the main spaces.
- 3.8 The associated works will result in the demolition of several buildings including the following:
- Former bungalow;
 - Engineers Workshops & Stores;
 - Ingredients Store, Bean Mixing & Chilled Store; and
 - Tank Farm.

- 3.9 The gross external area of the proposed building will be 18,965m² whereas the gross internal area is 18,410m². The demolished buildings gross internal area total is 6,427m².
- 3.10 Parking provision will be able to accommodate 576 car parking spaces which is a reduction from the existing 600 parking spaces available on site. The reduction of 24 car parking spaces can be accommodated by appropriate management and show more sustainable transport management can be secured. The existing car parking along Bridge Road will be retained, whilst the two new areas will be provided with one area of parking on the western portion of the site to rear of the HGV park and pallet storage on the existing grassland. Another area of parking will be located to the eastern boundary of the site towards Hospital Drove on the existing grassland. This area of parking will likely be used as the compound area for the contractor carrying out the development, subject to these proposals securing the necessary consent including this application for planning permission.
- 3.11 Further details of the proposed development are included in the Design and Access Statement which accompanies the planning application.

4.0 PLANNING HISTORY

4.1 A search of the Local Authority's online planning portal identifies the following planning application that relate to the application site.

Application Reference	Description	Decision
H10-1046-15	Refurbishment of offices and extension to form staff canteen and changing facilities.	Approved (5 th May 2016)
H11-0390-13	Erection of portacabin for use as security gatehouse (retrospective)	Approved (17 th April 2014)
H10-0943-11	Proposed signage	Approved (26 th January 2012)
H10-0061-09	Erect sub-station and switch room	Approved (24 th May 2009)
H10-0972-03	Industrial/warehousing/transport development (outline renewal application H10/1002/00)	Approved (12 th November 2003)
H10-1002-00	Industrial/warehousing/transport development. (Renewal of H10/1078/94)	Approved (6 th December 2000)
H10-0946-97	Industrial/warehousing/transport development (Renewal of H10/1030/90)	Approved (30 th December 1997)
H10-1078-94	Industrial/warehousing/transport development (Renewal of H10/1030/90)	Approved (8 th February 1995)
H11-0914-93	Construction of biofuelled boiler plant	Non-determination (24 th March 1999)
H10-1207-91	Industrial/warehousing/transport development (Registered as H10/1030/90)	Approved (23 rd December 1991)

Table 1: Planning History

4.2 The scope of these works demonstrates the evolution of development on the site over the years. This has often taken the form of incremental and piecemeal developments required on an ad hoc basis to secure appropriate working conditions on the premises.

- 4.3 The planning permission granted under H10-1046-15 provides background to the risk of flooding as has been addressed in this area in past development proposals. This example demonstrated that the initial objection to development in this area raised by the Environment Agency was based on finished floor levels of development being lower than modelled flood levels. It was identified that if it was not practicable to raise the floor levels, which given the built form is on an existing site, an area of safe refuge would need to be incorporated that was above the maximum flood depths. These matters have been taken into account through the evolution of the design of this proposal and informed the indicative Drainage Strategy and Flood Risk Assessment which accompanies this planning application.
- 4.4 The construction of a new Raw Material Handling & Kitchen facility is essential to the efficient running of food production on the site and will support the continued growth of operations of Princes at the Long Sutton premises.
- 4.5 This proposal will help to meet the strategic objectives set out in the extant South Holland Local Plan (2006) and the Draft South East Lincolnshire Local Plan 2011-2036, with the site at Long Sutton identified as a main employment area.

5.0 PLANNING POLICY CONTEXT

5.1 Reference to national and local planning policy applicable to the application proposal is detailed below.

National Planning Policy Framework (2018)

5.2 The updated National Planning Policy Framework (2018) (the 'Framework') sets out Government's aims and objectives for the planning system. The Framework is an important material consideration that should be interpreted alongside the development plan.

5.3 At the heart of the Framework, is the presumption in favour of sustainable development (paragraph 8). It is considered that the proposal accords with the three dimensions of achieving sustainable development set out at paragraph's 8 and 10 of the Framework.

- An Economic Objective – the application proposal will help to support a strong, responsive and competitive economy by supporting the growth of an established business through innovation and improved productivity;
- A Social Objective – the application proposal will support and enhance the vibrancy of the community through its contribution to the local economy by employing local persons and tradesmen;
- An Environmental Objective – the proposal will support and enhance the opportunities for flora and fauna within the site.

5.4 Paragraph 11 of Framework outlines decisions should apply a presumption in favour of sustainable development and for decision making this means approving development proposals that accord with an up-to-date development plan without delay.

5.5 The Framework goes on to identify that sustainable development should be positively treated and that local planning authorities should approach decisions on proposed development in a positive and creative way (Paragraph 38). The opportunity to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area should be grasped and decision makers at every level should seek to approve applications for sustainable development where possible. In accordance with Paragraph 47, decisions on applications should be made

as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

5.6 The importance of early engagement with the local planning authority is stressed by Paragraph 39 which establishes that good quality pre-application discussions has the potential to significantly improve the effectiveness of the planning application system for all parties. As part of the application process the applicant has sought to engage local residents and the LPA to discuss the development proposals. Further information regarding these discussions can be found in the Statement of Community Involvement which accompanies the planning application.

5.7 Chapter 6 of the Framework relates to building a strong, competitive economy. Paragraph 80 in this chapter states that;

‘Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.’

5.8 The development proposal will expand operations and improve the productivity of operations on site. The development will help to support economic growth within the local area.

5.9 Chapter 6 also lends itself to supporting a prosperous rural economy, paragraph 84 sets out that,

‘Decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable. The use of previously developed land, and sites that are physically well-related to existing settlements should be encouraged where suitable opportunities exist.’

5.10 The application site is located outside the settlement boundary for Long Sutton, however the development proposal relates to the expansion of an existing employment use. The

site is well served by a bus services which run on a half hourly basis from a stop directly outside of the site. A Transport Assessment, submitted as part of this application, demonstrates that the traffic associated with this expansion will not result in any adverse impacts to local highways. The proposal represents a sustainable form of employment development, which is well related to the existing settlement and is easily accessible, the development proposal will help to support the continued vitality of the rural economy.

5.11 Paragraph 102 of the Framework states that transport issues should be considered from the earliest stages of plan-making and development proposals, in order that:

- a) *the potential impacts of development on transport networks can be addressed;*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) *opportunities to promote walking, cycling and public transport uses are identified and pursued;*
- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *patterns of movements, streets parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*

5.12 The submitted Transport Assessment produced by Waterman Ltd identifies that the proposed use will not have a harmful impact on the local highways network and that the site location benefits from good access to sustainable transport modes.

5.13 Paragraph 111 states that,

'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.'

- 5.14 In accordance with paragraph 111, a Travel Plan has been produced by Waterman Ltd.
- 5.15 Paragraph 163 of the Framework states that when determining planning applications, Local Planning Authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exceptions Test. As part of the application a Flood Risk Assessment and Drainage Strategy has been produced by Waterman Ltd. The findings of this report can be found in Section 6 of this Statement.
- 5.16 It is also noted that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. The advice in Paragraph 55 is that conditions being agreed early is beneficial to all parties involved in the process and can speed up decision making. The Applicant would welcome the opportunity to discuss conditions, particularly pre-commencement conditions, in order to adopt a pro-active approach to delivering development on the site.

South Holland Local Plan (2006)

- 5.17 The South Holland Local Plan was adopted in 2006 and sets out the Council's planning policies for development and use of land until the year 2021. In the accompanying Local Plan proposals map, the application site falls within an area allocated for employment use, a major employment area and includes a portion of land within the open countryside. This is indicated in the extract of the plan provided at Figure 4 of this Statement.
- 5.18 Following a direction by the Secretary of State, on 18th July 2009 several policies in the Local Plan were deleted, with the remaining policies saved until the adoption of the South East Lincolnshire Local Plan which was submitted for examination in June 2017.

Policy SG1 – General sustainable development

- 5.19 Policy SG1 states that Planning permission for development will be granted where the Council is satisfied that the proposal is consistent with the principles of sustainable development, and where:

- *the quality of life for residents is unimpaired or enhanced;*

- *reasonable measures have been taken to conserve energy and natural resources; and*
- *South Holland's essential character and main environmental assets are not damaged.*

5.20 The development proposal has been designed to ensure that there is minimal impact on the quality of life of neighbouring residents, the development proposals have been directed away from neighbouring properties where possible. It is not considered that the proposal will have any impact on the character of South Holland or its main environmental assets, the built form on site is already significant and the proposal will not materially increase the visual prominence of the site to the surrounding area. The development proposal has been designed to ensure that it does not have an impact on neighbouring properties, nor the environmental assets of South Holland.

Policy SG2 – Distribution of development

5.21 Policy SG2 states that, proposals for development must be located having regard to sustainable development proposals. They should:

- 1) adopt a sequential approach which gives priority to the use of previously developed land and buildings within defined settlement limits, then to greenfield land within defined settlement limits and finally to land adjacent to defined settlement limits;*
- 2) make efficient use of land;*
- 3) ensure that, wherever possible, development is served by a choice of transport modes including existing public transport or by improvements to public transport infrastructure linked directly to the development and the existing highway network; and*
- 4) ensure that the development is acceptable in terms of traffic generation and road safety in the surrounding area.*

5.22 In consideration of this policy, the development proposal has been designed to make the most efficient use of the existing site. This will involve consolidating operations and utilising areas of the site that are currently built up. However, investment in the sites expansion will require growth of the area occupied by built form and hardstanding for

warehousing and car parking in particular. The development is, by its nature, essentially located to the existing facilities operated by Princes and as such the investment in extending and improving the production line capacity and efficiency is the most sequentially sustainable and logical approach to investing in the business and the local economy generally. A sequential approach is thereby not required nor applicable to this application.

- 5.23 The development is adequately served by a regular bus service which runs every 30 minutes from a stop located directly outside of the site, the traffic generated by this proposal will have a negligible impact on the surrounding highways.

Policy SG3 – Settlement hierarchy

- 5.24 Under the policy, Long Sutton is defined as an Area Centre that will continue to provide housing, employment and commercial development to support their roles as service centres for surrounding rural areas. This proposal, to consolidate and expand operations on site, can support the local economy of Long Sutton, and the function of the settlement as an Area Centre.

Policy SG4 – Development in the Countryside

- 5.25 Policy SG4 sets out that planning permission will only be granted for development in the open countryside that is essential in the proposed location and cannot reasonably be accommodated within settlement limits.
- 5.26 The development proposal relates to the expansion of the existing Princes facilities which are essential to the operations of production on site. It is unfeasible that these are located off-site, the proposed development is, therefore, essential to the established use in this location.

Policy SG7 – Energy efficiency

- 5.27 Development proposals will be encouraged where they are designed to provide maximum energy efficiency, through site layout and orientation, through the layout and design of individual buildings, including maximizing solar gain especially for residential buildings, and where they make full practical use of energy from renewable resources.
- 5.28 All development with a floor space of 1,000m² or more, will be required to demonstrate good practice in energy efficiency and to incorporate renewable energy production

equipment to provide at least 10% of its predicted energy requirements. The Sustainability Report accompanying the application outlines how this can be met by the use of appropriately energy efficient systems, using good practice to aid reduced energy demands and investigate opportunities to reduce the buildings overall carbon emissions.

Policy SG11 – Sustainable Urban Drainage Systems (SUDS)

5.29 Planning permission for development will be granted where the Council is satisfied that the proposal is consistent with the principles of sustainable development, and where:

- 1) *the quality of life for residents is unimpaired or enhanced;*
- 2) *reasonable measures have been taken to conserve energy and natural resources;*
and
- 3) *South Holland's essential character and main environment assets are not damaged.*

5.30 The indicative Drainage Strategy and Flood Risk Assessment which accompanies this planning application outlines that the existing SuDs system will be retained on the eastern development site and that additional SuDs will be installed to accommodate with the increase in hardstanding.

Policy SG14 – Design and Layout of New Development

5.31 In assessing proposals for new development Policy SG14 sets out key considerations that should be taken into account with regards to design and layout. Development should make a positive contribution to the local area and should not have an adverse effect on the character and appearance on the locality.

5.32 The application site is an established use and is formed of various significant industrial buildings. The new building will be in keeping with the scale, character and layout of the existing site and similar food processing plants. The appearance of the proposed building will be a substantial improvement with a modern cladding approach to a sustainable building rather than the range of ad hoc buildings and plant that have accumulated over time.

5.33 The proposal will not introduce new built form which is not already existing in the area, it will therefore not have an adverse impact on the character or appearance on the local area.

Policy SG15 – New development: Facilities for road users, pedestrians and cyclists

5.34 Policy SG15, states that,

‘Proposals for development shall provide safe and convenient access to and within the site for motor vehicles, cyclists, pedestrians, the less able-bodied and people with disabilities to accommodate the potential increase in movement generated by the proposal. New and improved roads, cycleways and footpaths shall reflect through layout and design the anticipated nature of future traffic and the character of areas to be served.’

5.35 The development proposal will result in the relocation of the existing parking provision, and ultimately increase car parking. Appropriate consideration has been given to the new parking layout to ensure it achieves safe and convenient access. While taking the opportunity to reduce the availability and rationalise parking and encourage non-car use where possible through the measures set out in the Travel Plan which accompanies the application.

Policy SG16 – Parking standards in new development

5.36 In relation to parking standards in new development; the policy expects proposals to provide appropriate parking and servicing arrangements. The submitted plans package and transport assessment demonstrate that the new layout can achieve appropriate parking and servicing arrangements.

Policy SG17 – Protection of Residential Amenity

5.37 Policy SG17 states that proposals that do not harm residential amenity will be granted planning permission. In considering proposals the following criteria will be taken into account:

- 1) *the extent of any overlooking or loss of privacy;*
- 2) *the extent of any overbearing or overshadowing effect;*
- 3) *potential noise nuisance including that associated with vehicular activity;*
- 4) *the levels of smell, emissions and pollutants.*

5.38 The proposed new buildings have been located a sufficient distance from nearby residential properties to ensure that they do not suffer from issues of overlooking,

overbearing, overshadowing or loss of privacy. There is a distance of 45.7m from the edge of the proposed new building to the nearest residential property on Bridge Road opposite the site with intervening vehicular carriageway. There is 66.5m separation from the edge of the new warehouse to the neighbouring property to the east on Bridge Road.

- 5.39 A Noise Impact Assessment and Baseline Air Quality Assessment and Odour Qualitative Assessment have been submitted with the application. These demonstrate that the proposed development will not emit or result in harmful levels of noise, odour or pollutants, thereby, protecting the amenity of neighbouring residents.

Policy EC1 – Major employment areas – Sites allocated for employment use

- 5.40 This policy identifies the premises at Princes as a ‘Major employment area’ in which planning permission will be granted for employment uses (Figure 5). Provided that access and highway considerations are satisfactorily met and that the amenity of any nearby properties can be adequately protected.

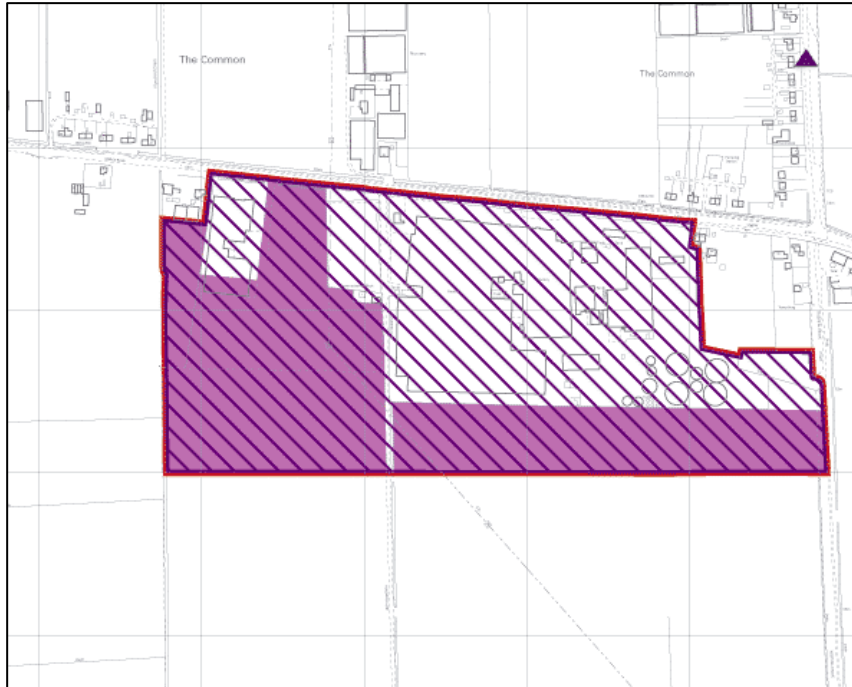


Fig 5: Extract from South Hollands Local Plan Proposals Map

Policy EC3 – Existing Employment Areas/Premises

- 5.41 In relation to development within existing employment areas Policy EC3 states that,

'Proposals for new development, redevelopment and changes of use for employment uses within existing employment curtilages and / or proposals for the expansion of existing employment undertakings will be permitted provided they are acceptable in terms of environmental impact, the level of traffic movement and intrusion into the open countryside.'

- 5.42 The submitted proposal is for the expansion of existing employment operations site, the supporting information to this application demonstrates that the proposal will not have a harmful environmental impact, or result in unsatisfactory traffic movements or protrusion into the countryside.

South East Lincolnshire Draft Local Plan 2011-2036

- 5.43 The draft South East Lincolnshire ("SEL") Local Plan was submitted to the Secretary of State on Friday 23rd June 2017 and was subject to consultation on proposed main modifications until the 28th August following Hearing Sessions as part of the Local Plan Examination process. This document has been created by the South East Lincolnshire Joint Strategic Planning Committee, a partnership of Boston Borough Council, South Holland District Council and Lincolnshire County Council.
- 5.44 This Local Plan will respectively replace South Holland Local Plan and the Boston Borough Local Plan and guide development in South East Lincolnshire over the next twenty years.
- 5.45 Although the document is not yet adopted, and the weight applied to it must be tempered in light of relevant objections and compliance with national planning policy, is a material consideration as per the advice in Paragraph 48 of the Framework which sets out how local planning authorities may give weight to relevant policies in emerging plans. It is worth noting that no modifications are proposed to the sites allocation in the Draft SEL Local Plan.

Policy 1: Presumption in favour of Sustainable Development

- 5.46 Policy 1 of the SEL Draft Local Plan states that,

'A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained within the National Policy Framework. Where appropriate, each Local Planning

Authority will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the Local Plan area.'

- 5.47 The applicant has sought to engage with the LPA at the earliest opportunity of the evolution of this development proposal in order to ensure that an appropriate scheme is created that is acceptable to both parties.

Policy 2: Spatial Strategy

- 5.48 As indicated in Figure 6, part of the application is identified as being within the Countryside policy area. Part d) of Policy 2 states that,

'In the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the areas in terms of economic, community or environmental benefits.'

- 5.49 The development proposal will facilitate the consolidation of operations of the application site and is essential growth and financial investment for the long term viability of the facility. The proposal will help to support the growth of the business and support local economic development. The area of Countryside is semi-improved grassland, with little biodiversity value and performs poorly in terms of countryside value. Overall, there is a strong emphasis on supporting rural economic growth and this proposal will help to support sustainable development in accordance with the Framework. The Ecological Impact Assessment and Soft Landscaping Plan sets out how more environmental benefits can also be delivered from the development.

Policy 3: Development Management

- 5.50 Policy 3 sets out that proposals requiring planning permission will be permitted provided that sustainable development considerations are met, including the following:

1. *Size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses;*
2. *Quality of design and orientation;*

3. *Maximising the use of sustainable materials and resources;*
4. *Access and vehicle generation levels;*
5. *The capacity of existing community services and infrastructure;*
6. *Impact upon neighbouring land uses by reason of noise, odour, disturbance or visual intrusion;*
7. *Sustainable drainage and flood risk; and*
8. *Impact or enhancement for areas of natural habitats and historical buildings and heritage assets.*

5.51 The size of the proposed Raw Material Handling & Kitchen facility is commensurate with the scale of the existing facility at Bridge Road, and has been designed to provide a simple yet organised building that rationalises the sporadic buildings of the existing site and significantly improves production lines. The site is well serviced by public transport and will not have a negligible impact on the local highways. Appropriate mitigation measures have been put in place to ensure that amenity of neighbouring residents is not negatively impacted such as through the use of acoustic sound barriers. The development has given relevant consideration to flood risk and will help to enhance opportunities of natural habitats. Overall, the development proposals complies fully with the goals of sustainable development.

Policy 4: Design of New Development

5.52 Policy 4 sets out that,

“All development will create distinctive places through the use of high quality and inclusive design and layout and, where appropriate, make innovative use of local traditional styles and materials.”

5.53 The proposed Raw Material Handling & Kitchen facility has incorporated a colour palette that will ensure that the building has a reduced prominence and visual impact and does not have a harmful impact upon the setting of the landscape character. The existing site is a series of piecemeal developments without uniformity which creates a disordered

appearance. The new development will introduce a new built form which will bring a simple and uniform design which will be much more visually attractive.

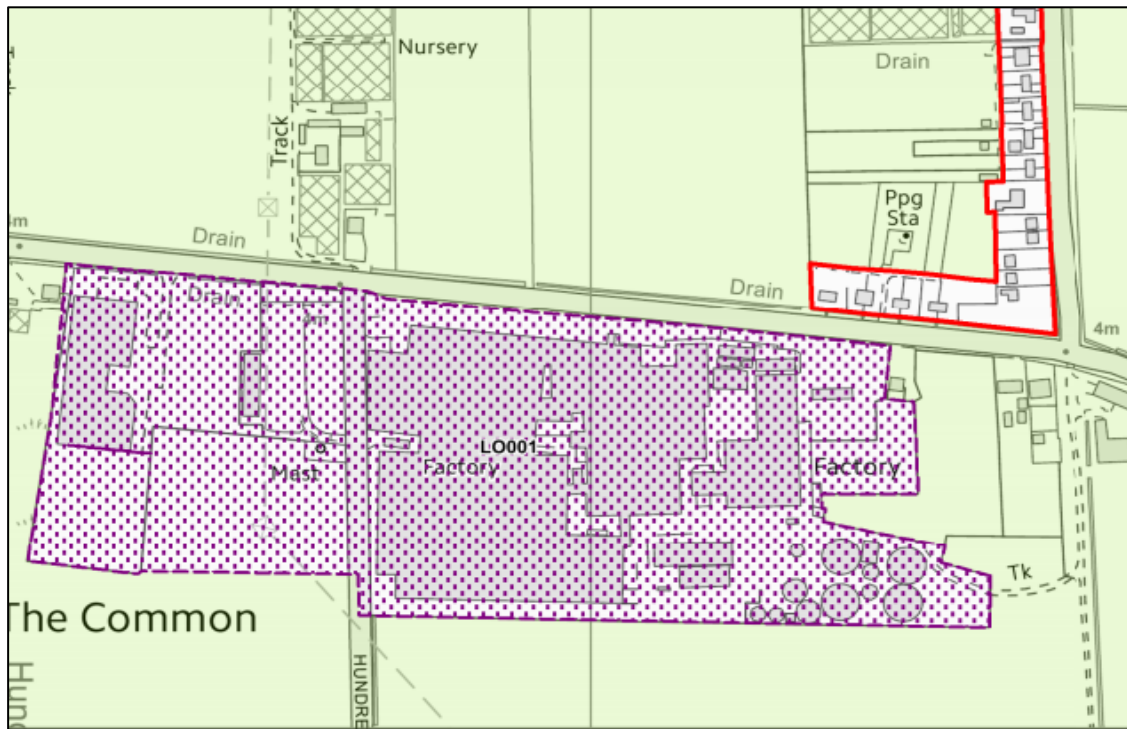


Fig 6: South East Lincolnshire Draft Local Plan Proposals Map Extract

Policy 5: Strategic Approach to Flood Risk

5.54 Policy 5 states that,

“Major development shall be located in areas at the lowest hazard or probability of flooding and shall not, in itself, increase flood risk.”

5.55 The Flood Risk Assessment and Indicative Drainage Solution produced by Waterman Ltd sets out that although the site is identified as being at risk of flooding, the proposed use is considered appropriate for the area and that a viable means of drainage can be achieved.

Policy 8: Improving South East Lincolnshire’s Employment Land Portfolio

5.56 As indicated in Figure 6, the Long Sutton site is also allocated within the Draft South East Lincolnshire Local Plan as a ‘Main Employment Area’ in which proposals for B2 development will be supported.

5.57 With regard, to its designation within this draft document, this highlights the local planning authorities' commitment and support for employment use on this site. Therefore, adding further support that this location as acceptable for the proposed development in policy terms.

6.0 PLANNING ASSESSMENT

- 6.1 Paragraph 8 of the Framework, emphasises the presumption in favour of sustainable development. With regards to decision making, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate that development should be restricted.
- 6.2 The South Holland Local Plan allocates the Princes site on Bridge Road as a '*major employment area*'. While the area of land within the application site being part of the Countryside is capable of development in this location because of its relationship with the existing Princes site. This is similarly the case of the draft SEL Local Plan. As such the presumption in favour of sustainable development applies.
- 6.3 The proposed development is sustainable development. The proposal will rationalise facilities on site in order to improve the efficiency of operations, which in turn will provide a platform to sustain the continued growth and success of food production at the Princes Long Sutton site. Consequently, this will secure long term economic investment for local people and businesses thus supporting the local economy.
- 6.4 This application has taken into consideration the potential impacts of the development, having due regard to national and local planning policy.

Principle of Development

- 6.5 The site is located as a '*major employment area*' under policy EC1 of the South Holland Local Plan and is further more allocated as a 'main employment area' in the draft South East Lincolnshire Local Plan. These policies support proposals for employment use and will grant planning permission for those that possess adequate highways access and protect the amenity of nearby properties adequately.
- 6.6 As indicated in Figure 4, a portion of the application site lies outside of the Major Employment Area allocation, this area of land is currently covered by grassland, with little amenity value. Policy 2d) of the South East Lincolnshire Local Plan sets out that development in the Countryside will be permitted where it is necessary to the location and that it meets the needs of sustainable development. As mentioned previously, the proposed development for the Raw Material Handling & Kitchen facility is essential to

the efficient operations of the company consolidating many of the buildings on site and to cope with the growing demand on the facility at Bridge Road. This parcel of land located outside of the employment land allocation performs poorly in terms of countryside due to being located on all sides by built form. In addition, the ecological impact assessment confirms that this area of semi-improved grassland has very little ecological value.

- 6.7 The proposed development is essential to the existing operations of the site and will support the sustainable growth of the facility and support local economic growth. The principle of such a use is therefore considered acceptable with this '*Major employment area*' and the proposal should be viewed upon favourably.

Environmental Impacts

- 6.8 The site is not subject to any formal landscape designations. There are no historic buildings or key local views across the site.
- 6.9 The location of the proposal is located within an existing industrial premises comprising of large industrial buildings, vehicle parking and security fencing. Located directly south is a large wind turbine measuring 53m in height and to the west of the site are several other large industrial premises. The proposal should therefore be considered in the context of its location and it is not considered that the proposed development would be incongruous with the surrounding built form or represent development that would have a greater visual impact.
- 6.10 With regard to the neighbouring residential properties to the east of the site, the proposal includes the provision of landscaping measures along the boundary of the site in order to protect their residential amenity in accordance with policies SG1 and EC1.

Heritage

- 6.11 There are no heritage assets, including Listed Buildings or Schedules Ancient Monuments within, adjacent or close to the application site. The site is not within or adjacent to any designated historic landscape or conservation area. As set out within the Statement of Community Involvement, it has also been established in dialogue with Lincolnshire County Council that there is no archaeological value to the site.

- 6.12 The site is located within an established industrial site and it is not considered that the proposed development will have any impact on any heritage asset or their setting.

Ecology

- 6.13 An Ecological Impact Assessment has been produced by Waterman Ltd in support of the application. This report highlights the potential ecological constraints and opportunities within the site and determine if any additional ecological assessments need to be carried out and to make any recommendations for ecological mitigation and enhancement measures.
- 6.14 Various different habitats were identified during the survey including; amenity grassland, bare ground, buildings, ditches, short perennial vegetation, hardstanding, ornamental planting, scrub, semi-improved grassland, tall ruderal vegetation, trees and walls/fences. Each of these habitats were assessed as part of the Ecological Impact Assessment.
- 6.15 The study provides an assessment of the potential for these habitats to support fauna. In respect to amphibians it is considered that the site could not support Great Crested Newts and is unlikely to support any others. The existing buildings and limited vegetation on site were considered to have a low potential to support roosting bats and no bats were recorded during the evening bat survey of the existing bungalow on site. The site is considered to only support a small number of common species of birds. Overall, the report considers that due to the limited size or diversity of the habitats on site, there is limited ecological value albeit there is an opportunity for bat boxes and enhanced bio-diversity to be delivered.
- 6.16 This will ensure that development can, in line with Policy EN1A of the South Holland Local Plan, in order to enhance ecological opportunities within the site the report recommends that bat and bird boxes are erected to support these species. These recommendations can be incorporated into the detailed design and be subject to a planning condition which can incorporate those principles set out in the Soft Landscape Plan which accompanies the application.

Arboriculture

- 6.17 An Arboricultural Impact Assessment has been undertaken by Brindle & Green in support of the application. The Assessment provides a summary of which trees may be impacted by the development proposal and outlines a draft tree protection plan.

- 6.18 The assessment identifies that several trees within the development site are considered suitable for removal and that any remaining trees within the site should be retained. It is identified that there is space to the east of the proposed car park to provide a buffer area that will protect the roots of an existing tree, outside of the applicants ownership, from being impacted by the development and will provide space for some replanting which will offset the loss of trees within the development site. Pruning and canopy reduction of the tree outside of the ownership of the applicant will be required to facilitate the development.
- 6.19 A proposed tree plan and appropriate mitigation measures are outlined within the report these will inform the subsequent Arboricultural Method Statement. The final measures of the Method Statement will be agreed with the LPA, subject to condition.

Highways and Access

- 6.20 A Transport Statement and Travel Plan has been produced by Waterman Ltd in support of the application. The Transport Statement sets out that no new vehicular access points will need to be created in order to accommodate this development; the existing access points on Bridge Road will be utilised by staff and visitors while the one way system through the site from Hundreds Lane will be retained for deliveries to this site. However, to facilitate the pedestrian movements to the new staff car park on the western car park a new pedestrian crossing would be provided on Hundreds Lane.
- 6.21 It is acknowledged in the report that the location of the site is such that existing sustainable travel opportunities are appropriate and reasonable given its location. Pedestrian/cycle facilities are generally of a good standard within the local area and provide safe and convenient routes to bus stops and local areas.
- 6.22 In order to encourage sustainable travel, a Travel Plan has been prepared, This Plan sets out measures to encourage sustainable transport modes to private car use.
- 6.23 The new development will not result in a significant increase in traffic to the site. As is noted in the Transport Statement submitted with the application, the increase in vehicles movements is limited to 30 HGV trips a day, an increase from 60 to 90. In terms of the impact on local highway network, this level is considered to be within the level of flow change which occurs daily on the local highway network and as such will not have a

material impact. Taking into account the historic use of the site, the impact on the local highway is not considered to be severe.

- 6.24 The report suggests a series of measures to minimise the impact of construction traffic on the existing road and highway network. These measures are suggested to minimise inconvenience and disruption to the public. The full package of measures will be agreed with the Highway Authority within a Construction Traffic Management Plan subject to condition.

Noise

- 6.25 The application is accompanied by a Noise Impact Assessment, undertaken by Waterman Ltd, which provides an assessment of the potential change to operational noise emissions at the nearest residential receptors to the site of the proposed changes. Prior to undertaking the noise survey, the South Holland Environmental Health Department were consulted to agree the strategy and assessment approach. An approach was agreed with the department and it was further confirmed that target noise limits of any new fixed external plant should not exceed prevailing background noise level by more than 5dB.
- 6.26 A baseline survey identified that the nearest sensitive receptors to the site are the residential houses fronting Bridge Road to the north of the eastern area of the site and the two isolated dwellings adjacent to the eastern site boundary. At both of these locations, road traffic noise was considered to be the dominant noise source, with vehicles movements noted as frequent not continuous. Noise from the application site was noted as being occasionally discernible.
- 6.27 The effect of the reorientation and relocation of the Pea Processing Unit is considered to have a negligible noise impact effect on the nearby sensitive receptors.
- 6.28 With respect to the unloading operations associated with the Raw Material Handling & Kitchen facility taking into account the provision of the proposed 3.5m high service yard acoustic grade fence the assessment predicts a predominantly negligible impact. With a minor adverse impact at night-time on the eastern boundary but below the suggested 5 decibel threshold.

- 6.29 The report sets out that during the shift change based on 262 movements over a 1 hour period the predicted impacts are negligible at the residential receptors on Bridge Road with minor adverse impacts at the properties located to the east of the eastern boundary. The noise levels from the re-routing of the HGV movements is predicted to result in a negligible impact.

Flood Risk and Drainage

- 6.30 The site is located within Flood Zone 3 as such this application is accompanied by a Flood Risk Assessment, undertaken by Waterman Ltd.
- 6.31 The report acknowledges that in the previous Flood Risk Assessment report submitted as part of application ref: H10-1046-15 for an office and canteen extension that the Environment Agency (EA) objected on the following grounds; no tidal breach analysis was undertaken, no justification was made for finished floor levels and no indication of flood mitigation measures or resilience techniques had been made. As part of the FRA and Drainage Strategy produced by Waterman Ltd these previous objections have been noted and addressed. Consultation with the EA has been undertaken at the earliest opportunity.
- 6.32 In terms of the requirement for a sequential test the development proposes expansion to the sites existing use and therefore it is not considered feasible to relocate the development to a less flood prone area. The proposed uses are also classified as a 'Less Vulnerable' use which is suitable for development within Flood Zone 3. The development is therefore exempt from the exceptions test.
- 6.33 The report sets out that the site is well serviced by local drainage channels, with a drainage ditch situated to along the northern side of Bridge road on the northernmost boundary of the site, a drainage ditch passing south along the eastern side of Hundreds Lane, a drainage channel which passes along the northern and southern extents of the A17 which passes the site to the south and a drainage ditch passing south along Hospital Drove before continuing south to the east of the site. Based on local evidence, it would appear no flooding problems are associated with the local drainage systems.
- 6.34 To mitigate against future surface water flood risk, the proposed development will include a positive surface water drainage system which will intercept the run off generated within the site itself and reduce the incidence of overland flow causing flooding on adjacent

land. The risk of surface water flooding affecting the site is therefore considered to be low subject to the provision of a positive surface water drainage system.

- 6.35 Based on the mudstone dominant bedrock geology the site is not considered to be at risk from groundwater flooding. In addition, fluvial flooding is not considered to be the dominant flooding mechanism affecting the site and local area but rather tidal.
- 6.36 The proposed surface water drainage strategy for the western development site the proposed attenuation will cater for runoff generated by any proposed increases in hardstanding. Surface water flow from the western site will convey north via series of surface water pipes to an attenuation tank, positioned north of the developable area. The attenuated flows are proposed to connect into the surface water 'stream' flowing west – east adjacent to Bridge Road north of the site.
- 6.37 In respect to the proposed surface water drainage strategy for the eastern development site as the development doesn't propose any additional hardstanding areas, with exception of an additional car parking area, it is proposed that the majority of runoff generated will pass through the existing site's drainage system. Areas within the eastern development site proposed for development will be serviced by an attenuation tank situated to the east of the site to deal with surface water flows.
- 6.38 Surface water flow from the additional proposed hardstanding areas will convey north via a series of surface water pipes to an attenuation tank, positioned north of the proposed hardstanding area, This tank will harbour approximately 295 m³ of storage with flows of which controlled by a hydro-brake. The attenuated flows are proposed to connect into the 600mm surface water sewer flowing west-east adjacent Bridge Road.
- 6.39 Foul drainage generated by the food processing areas will discharge to the effluent treatment plant to the south east of the site before discharging into Anglian Water foul sewers.
- 6.40 Overall, although the site is shown to lie in Flood Zone 3, detailed modelling undertaken as part of the South Holland SFRA shows that the site is outside of the predicted flooding. Provision of an evacuation plan is advised in the unlikely event of a 'severe' flood event occurring. It is also considered that a viable means of drainage has been proposed.

Site Investigations

- 6.41 A Phase I and Phase II Site Investigation report has been produced by Solmek Ltd. The Phase I desk based study sets out that the site has remained largely undeveloped over time with a railway line running across the site. The report confirms that the site became developed with a factory in 1952. The Phase I report expects that contamination is present on site due to the former railway line that crossed the site and from the construction/demolition works which may be present with asbestos. It also confirms that the Made Ground is expected as such a ground gas assessment is required. Table 5 of the Phase I report recommends the scope of investigations for the Phase II report.
- 6.42 Following the recommendation for additional investigations a Phase II Site Investigation Report was undertaken by Solmek Ltd to ascertain the presence of underlying contamination from historical and contemporary activity at the site. In line with the recommendations of the Phase I report 29 hand dug boreholes drilled to a maximum of 1 metre below ground were dug and a further 18 machine excavated trial pits were dug to 1.1 metres below ground level.
- 6.43 In terms of the ground conditions encountered, tarmac or concrete was present at the surface of boreholes and directly overlay made ground comprising of rounded sand or gravel dolomite fill. Top soil was noted in the majority of trial pits except where clay was noted. Groundwater was only noted within one trial pit within made ground.
- 6.44 Following this, a conceptual model and contamination analysis was undertaken to develop and communicate the risks associated with the particular site. The general findings, conclude that the construction workers and construction materials are potentially at risk as pollution linkages may be present.
- 6.45 A series of mitigation measures are suggested by the report to reduce the risk identified to each receptor. Such as if during the initial site strip and subsequent construction works if any zones of odorous or suspected contaminated ground is encountered then work should cease and further testing will be required. In respect to construction workers, the levels of contamination may pose a risk to construction workers, as such it is recommended that appropriate PPE in accordance with HSE and Environmental Agency guidance is adopted. It is also possible that further asbestos containing materials may still be present on site and undetected. Therefore, the report advises that a watching

brief is undertaken and that a fully qualified engineer should supervise any excavation works.

Air Quality

- 6.46 An Air Quality Assessment has been undertaken by REC Ltd in support of the application. This report assesses the potential for development impacts at nearby sensitive locations during the construction and operational phases.
- 6.47 The report identifies that there is the potential for dust emissions during the demolition, construction and trackout activities and the potential for emissions associated from traffic generated from the proposed development.
- 6.48 In order to control the potential measures during the construction phase of the development a series of fugitive dust mitigation measures have been outlined in Table 20 of the report. This table includes measures such as undertaking daily on-site and off-site inspection of receptors, fully enclose site or specific operations with a high potential for dust production, implement a travel plan and implement a wheel washing system.
- 6.49 During the construction phase there is the potential for air quality impacts as a result of fugitive dust emissions from the site. However, incorporating good practice dust control measures as set out in Table 20, the residual significance of the potential impacts from dust generated by demolition, earthworks, construction and trackout activities is predicted to be not significant.
- 6.50 In respect to the potential significance of operational impacts including vehicle trips associated with the development, these are anticipated to be not significant.

Odour

- 6.51 A Qualitative Odour Assessment has been undertaken by REC Ltd in support of the application. The report sets out that due to the increase of Raw Materials on site there could be potential for odour impacts to arise, therefore the assessment is required to determine baseline conditions at the site and assess the potential impacts as a result of the proposed development.
- 6.52 The findings of the assessment conclude that the proposed development is likely to have a small odour potential and that the owing to the characteristics of the operational processes these do not include any intensive or unpleasant odour emissions.

- 6.53 Furthermore, the odour emissions from the existing operations on site which include cooking processes have been assessed previously and confirmed as not significant. These odours are likely to be more noticeable than the proposed and as such the odour that will arise from the proposed development is likely to be unnoticeable. Overall, the impacts of odour from the proposed development is not considered significant.

Light

- 6.54 An External Lighting Report has been produced by DarntonB3 Building Services in support of the planning application to carry out external lighting calculations and initial design for the proposed car parks and loading bays. The report identifies that 4 types of lighting fixture will be installed as part of the development proposals including; wall mounted LED conicals to be installed on the walls of the proposed extension, suspended LED strip lights to be installed in the loading bay canopy, LED floodlights to be installed to the walls of the loading bays and LED floodlights to be installed on 8m columns within the car park.
- 6.55 The report sets out that the maximum level of light intrusion acceptable to neighbouring residential properties in this location is 2 lux after curfew (11pm) as set out by the ILP – Guidance Notes for the Reduction of Obtrusive Light GN01:201). The assessment of the proposed lighting confirms that the light intrusion will be 1.38 lux which is below the maximum light trespass after curfew time. The proposed external lighting scheme is considered appropriate.

Summary

- 6.56 The assessment has demonstrated that the proposed development will not result in any adverse impacts that will significantly or demonstrably outweigh the benefits of the proposal.
- 6.57 The proposed development will utilise land that is already used for industrial purposes and will the result in the consolidation of several ancillary units in order to create a purpose built Raw Material Handling & Kitchen facility.
- 6.58 This proposal will not be introducing new built form which is conflicting to the surrounding area and the land use allocations set out in the extant and emerging planning policy. The development will not result in adverse environmental impacts such a noise pollution,

air quality or highway safety as demonstrated in the accompanying technical reports and recommended mitigation measures.

- 6.59 With regards to the Framework's presumption in favour of sustainable development the site is allocated by local planning policy as a main area of employment therefore the proposal should be considered acceptable in policy terms.

7.0 CONCLUSIONS

- 7.1 This Planning Statement has been prepared by DLP on behalf of Princes Ltd in support of a planning application for the erection of a Raw Material Handling & Kitchen facility at Bridge Road, Long Sutton.
- 7.2 This Statement has provided a detailed assessment of the relevant national and local planning policy guidance in the context of the proposed development and has demonstrated that the proposals comply with relevant national and local planning policy.
- 7.3 This assessment of the proposal has sought to judge the impact of the proposals and take into consideration the benefits of granting planning permission. There are no specific policies in the Framework, or any other material considerations, that indicate that development should be restricted.
- 7.4 The development proposal will result in the demolition of several existing buildings in order to consolidate operations into the Raw Material Handling & Kitchen facility which will improve efficiency of operations and support the continued expansion of Princes Ltd food production at the Long Sutton Site. Moreover, this proposal will deliver a scheme which will continue to support the economy and secure employment for local people.

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