**Horseshoe Farm**

**Mare Fen**

**Littleport**

**CB6 1RH**

**Ms J Brooks**

**Operations Director ECDC**

**The Grange**

**Nutholt Lane**

**Ely**

**CB7 4EE**

**30 August 2017**

**Dear Ms Brooks**

**Planning application FP McCann Wisbech Road, Littleport**

I am writing on behalf of the signatories listed below which represent every household within the proximity of the proposed new concrete factory at Mare Fen, Littleport. I would like to request a meeting with you to draw to your attention the concerns that we, and numerous other concerned residents, have about the handling of this planning application.

Not for a moment are we requesting that you influence the decision in any way - that would be entirely inappropriate. Rather, we simply ask that you ensure that the Planning department is truly objective in its assessment of the information before it and that the committee has all the relevant facts presented in a balanced way so that a fair and transparent decision can be made. This is simply good practice.

As you know, there have been mistakes made in the handling of this application. You will recall that the original planning decision was quashed due to the failure of the Planning department to assess the environmental impact of this proposal. I am sorry to say that, despite this judgement, there continue to be shortcomings in the handling of this application and, more concerning, clear evidence of bias and pre-determination.

It appears that information submitted by the applicant is not subjected to proper scrutiny and that there continue to be “short-cuts” in process designed to “tick boxes” rather than to properly consider the facts.

By way of explanation, the reference to pre-determination arises, amongst other things, from the fact that the ECDC separately signed a MOU with the LEP to support this expansion - even before the planning application was submitted. Planning officers and councillors attended an unminuted meeting with FP McCann, again before the application was submitted. The lack of an environmental assessment, which resulted in the quashing, was openly described to me and others as a “tick-box exercise” by a member of the planning committee in discussion with residents at a recent meeting of the Parish planning sub-committee.

If proper procedures are not followed the ultimate remedy for residents, if the application is approved, is another judicial review. Whilst we remain confident that a Judge would again find in our favour, all parties will surely wish to avoid this.

Listed below are a few examples of what residents consider to be evidence of bias and lack of scrutiny. We will present further examples when we meet.

ECDC has recently published its screening opinion which purports to address the environmental impact of the proposal. This document:

* commits two pages to a eulogy of the environmental benefits of pre-cast concrete in general;
* treats as fact the information in a discredited noise report submitted by the applicant even before residents, or even the council’s own Environmental Health department, has had an opportunity to comment on it;
* makes a series of commitments about what will happen for instance during the construction phase over which the council will have no control;
* references the aspiration for the site to operate 7am – 7pm 7 days a week;
* makes no reference whatsoever to the myriad concerns and challenges that have been raised by residents and to the objection that has been lodged by the Environment Agency.

To be blunt, the report *purports* to be a council document but reads as if it has been written by the applicant. It appears to residents that it has been generated simply to “tick a box”.

To emphasise this point, some other comments in the report would be amusing if the consequences were not so serious. For instance, the report suggests that a 50 ft high factory at the edge of Little Mare Fen Drove would be “imperceptible” behind a 10ft hedge. This miracle hedge, the report suggests, also blocks the view of the factory from all directions even when it is not in the line of sight.

The layout drawing in the council’s screening report is inaccurate, road names are incorrect, the quoted number of residences affected is incorrect, the site is on a flood plain but the report ignores flood risk, it ignores the traffic implications, it ignores dust generation, it ignores the fact that 10 acres of the proposed site have not been subject to any ecology assessment.

In short, the report is a travesty. The council’s screening opinion should be a balanced document, it should scrutinise the information the applicant has supplied and it should take account of the concerns raised by residents and by the Environment Agency.

Indeed, to ignore the comments of the Environment Agency, in a report that purports to assess the environmental impact of the proposal, simply beggars belief.

As you know, this will be a “departure” application. This means that the proposal runs counter to a whole raft of planning policies. As a matter of policy, it must therefore be rejected unless there are exceptional circumstances.

The supposed exceptional circumstances concern a claim by the applicant in its original submission that 90 jobs will be generated. No supporting information for this claim was submitted yet it was simply accepted at face value by the Planning department. We therefore had a situation where a single unsubstantiated (and unbelievable) claim was used as the only justification to recommend approval of the proposal contrary to numerous planning policies.

The employment claim has since been discredited by independent experts. Local developers have pointed out that the site will drive away new light industry and commerce from the area. Furthermore, although requested by the planning officer on 12 June 2017, and promised by the end of June, still no supporting information has yet been submitted by the company.

Even if, against all logic, the jobs claim is taken at face value, this proposal would generate 3 jobs per acre of farmland lost. The council’s own “Employment and Labour Market study” envisages some 134 jobs per acre of land reallocated for employment.

The residents are happy that this application is considered on its merits. They simply request that the merits and demerits are presented in a fair, objective and transparent manner with no pre-judgement and no bias.

I hope you will agree to a meeting so that we can discuss these concerns with you.

Yours sincerely