

Babergh & Mid Suffolk
Joint Local Plan: Consultation Document
August 2017

Woolverstone Parish Council's response agreed at a Parish Council meeting
Thursday 9th November 2017.

Strategic: Vision and objectives

Q 1. What do you think the vision should be?

There is simply no real vision in this Joint Local Plan Consultation Document. The vision for the area should be made much clearer. The Local Plan needs to be visionary. What is precious in Babergh now and how can this be preserved or enhanced by 2036? Woolverstone Parish Council doesn't see any vision of the sort of District Babergh wants to be? For example, how is it best to enhance our network of villages and market towns so they retain their special qualities without becoming a sprawling, increasingly urban landscape? It would be reassuring to see a commitment to eliciting how this could best be achieved. Is the best way forward to expand all the villages? We don't see in the vision any alternatives to the current mindset.

It seems to us that this approach is fundamentally flawed and that the absence of an initial vision is then all too apparent throughout the remainder of the document. Consequently, the draft comes across as an exercise driven predominately by an academic calculation of future housing numbers, rather than a real world vision of what should be delivered for the people and communities in Babergh and Mid Suffolk by the end of the plan period.

We therefore strongly suggest that the consultation is currently "putting the cart before the horse" and that a vision with wide community support should have been developed first. This vision should then have been a golden thread, evident throughout any subsequent consultation drafts on the joint local plan.

Notwithstanding that, we suggest that any vision should include the following through the plan period to 2036:

- Babergh and Mid Suffolk will remain attractive largely rural areas with thriving towns and villages and an attractive, varied landscape.
- Towns and villages will each retain their distinct characters. Coalescence of settlements will be avoided.
- Effective use will be made of previously developed land to minimise the need to build on green field sites.
- Wherever new housing is provided, it will respond to identified local needs including in relation to type, size, and tenure.
- All new housing will be to the highest design standards both visually, in the context of local character, and in environmental performance.
- The adverse impact of new housing developments on areas such as traffic congestion, air pollution and social cohesion will be minimised through the scale and location of developments and the enhancement wherever needed of physical, social and environmental infrastructure.
- Natural, built and heritage assets will be protected and, wherever possible, enhanced.

Q 2. Do you agree with the identified objectives? Please explain reasoning.

Building the right type of housing in the right place to meet the identified need is quite right. However what is happening is a travesty of this objective with increasing numbers of “executive” type homes with little attention to smaller units for youngsters starting out or the elderly downsizing. Currently “affordable” homes are “anything but affordable” for the majority of Babergh residents. The environmental objectives need to be matched by appropriate actions and should include greater detail. Why are we seeing a lag between development and infrastructure? Furthermore, housing developments need to be built only in appropriate sustainable locations.

Q 3. Are there other objectives which should be added?

No other obvious objectives immediately spring to mind in the absence of a holistic vision for the District as a whole.

Q 4. What should be a priority across the district area? (Please state which district)

Babergh. Preserving and enhancing our wonderful natural and historic heritage. Once it has gone we are never going to get it back again. The Local Plan needs to identify areas for housing that minimise the loss of our most productive agricultural land and heritage assets or introduce vast volumes of traffic spoiling the villages with speed, noise, severance, pollution and vibration. Identify the type of housing need within communities rather than what developers would like to build at most profit to them.

Q 5. What is most important for your town or village?

Woolverstone is an ancient estate village. Much of the building that is listed took place in the eighteenth and nineteenth century. As you travel through the village, much of the estate building is still in clear evidence. To the north of the B1456 the village is situated within the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty; to the south of the B1456 is within the AONB project area. The majority of the village is within a designated Conservation Area. However, the cumulative impacts of development further down the B1456 have brought noise, severance, pollution and vibration to the village. The local red brick walls, part of the historic fabric of the village, are being destroyed by the wash from cars through inadequate road drainage. The road is narrow in places and residents are subject to persistent speeding. This is before the impact of a 30% increase of traffic through the development at former HMS Ganges and Shotley Marina. Most important to Woolverstone is to see its designated Conservation Area protected and enhanced by planning policies and not being degraded by policy decisions. Second most important is to retain the vistas of ancient estate farmland and hedges without further development on the fertile (Grade 2) “greenfield” sites offered through the call for sites which have been listed in the Local Plan as being suitable for development. (Joint Local Plan Consultation Document. Appendix: SS0255 and SS0203)

Shotley Peninsula. Most of the Shotley peninsula is within Suffolk Coasts and Heaths ANOB. It is a unique location retaining the only ancient farmland estates in Babergh District. Our village of Woolverstone is on the B1456 which runs the length of the Shotley Peninsula; any development further down the road impacts on the communities along its way. We feel that there should be an overview of development for the whole Peninsula rather than piecemeal development in communities. The infrastructure is poor; one main road in and out takes the vast majority of traffic. We have frequent electricity outages in adverse weather. There is no access to gas. The bus service is poor and the level of service in the peninsula has recently been reduced. For many, there is little or no phone signal. Most of the population travel off the peninsula for work, shopping, post-16 education or leisure. The surgeries are shared across communities. The ability of the peninsula to cope with more housing should be looked at as a whole before it becomes a dormitory of Ipswich.

Strategic: Duty to Cooperate (pages 14 to 16)

Q 5A. Do you agree or disagree with the identified key issues for compliance with the Duty- to-Cooperate for the Babergh and Mid Suffolk Joint Local Plan? Please explain why.

Yes, it is obvious for an effective Local Plan. Especially given its stated emphasis on establishing ‘an ambitious yet sustainable growth agenda which will prioritise the infrastructure investment required to deliver the growth ambitions and will identify the locations for delivering the necessary housing, employment and recreational growth and development’. (See page 12 of the draft NJLP Consultation document).

Q 6. Are there any other key planning issues which need to be considered in accordance with the Duty-to-Cooperate? Please explain why

There needs to be “sign off” with Suffolk County Council on delivering the ‘priority’ infrastructure investment required.

Delivery: Housing Requirement (pages 18 to 22)

Options

HR1 – OAN. Set the housing requirement at the OAN level

HD1 – Apply a contingency

HD2 – No contingency

Q 7. Do you agree with the proposed approach set out under Option HR1? If not, please explain why and what alternatives you propose.

No. We feel that this approach takes the “easy option”. The inability of the District Council to deliver on the sites it has already given planning permission to should not define the approach to the new Joint Local Plan. There should be a clear examination of the problems that have led to this failure to deliver and a definition of possible solutions. Furthermore, neither should this inability to deliver hitherto give reason to target soft areas like rural “greenfield” sites. Please adopt Option HD2.

Q 8. When allocating sites what scale of contingency should be applied? Please explain why.

This is not a preferred option. No contingency should be applied..

Q 9. Are there any specific measures that could be included within the Joint Local Plan that would assist with delivery?

It would be useful if BDC explained why it had failed to deliver on its current targets. This would give a greater understanding of the situation. With just current plans, our village will have an additional 14 houses; 7 on redundant farm building site at Whitehouse Farm and 4 in redundant farm buildings at Home Farm; 1 in a redundant farm building at Dairy House. When these houses are built they will represent an increase of about 13% in the housing stock in Woolverstone. We think this is as much as the village can absorb and retain its character, both physical and social. Furthermore, this is in addition to the 4 new houses on the Nursery Garden development which are currently being built. We have taken our fair share.

Q 10. What factors or priorities should be set as triggers for reserve sites to come forward?

Identify the needs within a village. Increased employment opportunities. Availability of existing or planned infrastructure. Not because of a failure in another part of the district.

Delivery: Review of the Settlement Hierarchy (pages 23 to 27)

Options

SET1 - Key Services

SET2 - Key and supporting services

Q 11. Do you agree with the proposed criteria approach to rank settlements in the hierarchy? If not, please explain a suggested amendment or alternative.

Yes.

Q 12. Do you agree with the proposed joint settlement hierarchy? If not, please provide further details as to how the hierarchy should be amended.

We have reviewed the settlement hierarchy score for our village, Woolverstone, and have found it is not accurate. All settlement scores need to be reviewed before a final list is drawn up as we understand the allocation of points was based on desk research. We have been advised by Bill Newman, Corporate Manager – Strategic Planning in an exchange of e-mails (3 and 5 October 2017) where it was stated ‘We have been asking Parish Councils to pay particular regard to this piece of work, with a view to ensuring that its accuracy is checked and validated at a local level, as those Councils have the best and most up to date information in respect of the level of services and facilities within their area’. (5 October e-mail from Bill Newman to WPC)

The criteria points allocated for Woolverstone are inaccurate. It is currently awarded 11 points making it a Hinterland Village whereas we believe it should only receive a maximum of 8 points making it a Hamlet or Countryside Village.

Using the settlement hierarchy criteria:

- Woolverstone is more than 5 km from Ipswich. It is 7.8km. Therefore it should **not** be awarded 2 points for this category. (In comparison, Freston, which is closer to Ipswich, is awarded 0 points.)
- Another criterion is having allotments. The allotments in Woolverstone have been closed to new tenants by the Diocese of St Edmundsbury for a number of years. Current tenants can remain, three of whom are in their eighties, but empty allotments are not being re-let. There is **effectively no allotment** provision in the village. Therefore Woolverstone should be awarded 0 points instead of the 1 point it has been allocated.
- There **is** a fast broadband cabinet in the village. However, it is not available to everyone in the village and will not be in the foreseeable future. Further, we have a great number of residents who have no broadband/computer access at all.
- The bus service has just been reduced further (effective 30 October 2017) with the 202, 98 and 98A being taken out of service and being replaced by 97 and 98. Number of bus trips reduced from 11 to 9. Only two morning peak hour buses to Ipswich Mon to Sat: 07.41 and 8.43. The last bus from

Ipswich Mon – Sat is 18.30. There is no evening bus service which means anyone leaving the peninsula has to do so by car. There is a limited bus services on Sundays with 4 trips up and down the Peninsula. Having a bus stop does not mean you have an adequate service.

Due to the above points, we think Woolverstone should be classified as a Hamlet or Countryside Village. The criteria need to reflect the availability/usability of services not just the headline.

Delivery: Spatial Distribution (pages 28 to 32)

Options

BHD1 – county town focused

BHD2 – market town/rural area balance

BHD3 – transport corridor focused (2)

BHD4 – New settlement focused (1)

Q 13. Which option(s) for housing spatial distribution do you think is the best? Please explain your answer.

BHD4. Losing the rural character of our villages by creeping urbanization is an anathema to all. This is one area where spreading a little across all areas is misguided though perhaps easy to do. Often villages do not have the infrastructure to deal with the increase in housing. Purpose built new settlements in areas where there is a need and the infrastructure can be front-loaded would be far more preferable than ad hoc allocations. There is no mitigation for a small village such as Woolverstone with a projected increase of at least 30% in traffic if the housing developments for which planning approval has been granted are built. New settlements would avoid that scenario and could be based where they are needed and close to social and physical infrastructure such as roads, communications, energy etc.

Second choice would be BHD1 for reasons of infrastructure etc.

Q 14. Are there other realistic broad distribution options which should be considered? Please explain your answer.

No.

Q 15. If a new settlement was to be planned in the area, where should it be located? Please explain your answer.

BDC has access to the data about employment etc. and is best placed to know where these settlements need to be located. However, the principles would remain the same viz. in the most sustainable locations; transport nodes, access to most climate friendly energy sources, reduction in need for car transport, likelihood of uptake in public transport/cycling, local facilities and services and so on.

Delivery: Housing Types & Affordable Housing (pages 33 to 39)

Options

HM1 – housing mix to accord broadly with SHMA
HM2 – requirement for specific dwelling types
HM3 – residential and nursing homes and specialist housing
AH1 – Setting a requirement for affordable housing
RE1 – no market housing on rural exception sites
RE2 – market housing supported on rural exception sites

Q 16. Should the Joint Local Plan include a requirement for new dwellings to meet the Nationally Described Space Standards?

Yes. With access to gardens as well.

Q 17. Do you have any views on the proposed approach towards self-build and custom build dwellings?

The self-build register should ideally be more widely publicised.

Q 18. What should the Councils' approach to Starter Homes be?

With house prices at 9.6 to income this suggests we need more genuinely affordable quality homes. Taking Admiral's Quarter, Holbrook, as an example £260,000 is very expensive for an affordable home, in a rural area, considering level of income.

Q 19. Should the Councils be prioritising the provision of any particular types of homes?

Yes. There should be smaller homes, e.g. 1 or 2 beds, for youngsters and older people downsizing. We have too many "executive" type homes.

Q 20. Are there any other types of housing that should be planned for/required?

Many older people in our village would like to see more housing suitable for independent elderly people but allow them to remain in their rural communities where they have been for 60 plus years. These would be, ideally, smaller with greater convenience e.g. electric socket height, type of heating etc.; but, still with small gardens.

Likewise, young people in our community want to stay here but planning policy has allowed simple 2 bedroom cottages in our village to be extended to four bedrooms and, consequently, out of their price range.

Q 21. How can the Councils promote/facilitate development of homes for private rent?

No Comment

Q 22. In relation to affordable housing, do you consider the requirement should be set at a percentage other than the current 35%? If so, please provide reasons.

35% is acceptable. Although, we are clear that the term "affordable" has been degraded. So called "affordable" homes are not really affordable for most people.

Q 23. To what extent should affordable housing be (or not be) prioritised over provision of other infrastructure where viability is an issue?

Affordable housing is important in rural areas.

Q 24. In relation to affordable housing, should there be any preference for housing to accommodate key workers?

Yes

Q 25. If Option RE2 is supported, what maximum percentage of market housing should be acceptable?

No Comment

Delivery: Rural growth and development (pages 40 to 42)

Options

Rural growth

RG1 – a policy criteria based approach

RG2 – Allocations with flexibility for small-scale infill

Hamlets

HG1 – continuation of the current approach which would classify hamlets as open countryside in the settlement hierarchy

HG2 – Include a policy in the new JLP which would support appropriate infill development

Q 26. Which option for the policy approach to rural growth do you think is most appropriate?

HG1 - continuation of the current approach which would classify hamlets as open countryside in the settlement hierarchy. This is very relevant to Woolverstone

Q 27. Are there any other approaches to distributing development in rural areas that we should consider?

What is important in the rural community? This needs to be investigated. Villages are small settlements with their own history, landscape and architecture. Within there are vistas and views. The approach to the Shotley peninsula beside the River Orwell is heart-lifting and joyful. On the Peninsula itself there are quite winding lanes, small fields, ancient woodlands and due to 200 years of limited development between 1776 and 1937 a sense of order and tranquility that is missing in many other areas. There is almost a disconnectedness – which is treasured by those who seek to explore it. What would the impact of cumulative development be on the rural community?

Q 28. Do you support the approach proposed for hamlets? If not please explain?

Yes HG1_- continuation of the current approach which would classify hamlets as open countryside in the settlement hierarchy. This is very relevant to Woolverstone

Options

HG1 – continuation of current approach which would classify hamlets as open countryside in the settlement hierarchy §

HG2 – Include a policy in new JLP which would support appropriate infill development in “hamlets”

Delivery: Accommodation Needs of Gypsies and Travellers (pages 43 to 47)

Options

Permanent Gypsy and Traveller Sites

GT1 - allocate site(s) to meet identified requirements

GT2 – allocate site(s) for Gypsies and Travellers as part of residential allocations

Travelling Showpeople’s yards

TS1 – allocate site(s) to meet identified requirements

Existing authorized pitches and plots

EGT1 – protect existing authorized pitches and plots

Q 29. What should the Councils’ approach to provision of negotiated stopping places be?

Create a policy which encourages dialogue and forward planning to meet needs of the travelling community and residents.

Q 30. Please submit details of any sites, or extensions to existing sites, which you consider are suitable for allocation as Gypsy and Traveller sites or Travelling Show people sites

We have no suggestions

Delivery: Caravans and Houseboats (page 47)

Q 31. Should the Joint Local Plan include a policy which identifies areas where moorings would be acceptable in principal?

Yes. More and more young people have to resort to living on houseboats as a realistically affordable home.

Q 32. If so, are there any specific locations where additional moorings could be located?

We have no suggestions within our area

Delivery: Economic Needs (pages 48 to 49)

Options

ECON1 – allocate to identified need
ECON2 – allocate above identified need

Q 33. Should we continue to identify existing employment areas and protect land and premises in these areas from redevelopment/conversion to other uses unless marketing evidence demonstrates there is no demand for employment use?

Yes.

Q 34. If we continue to protect existing employment areas, which areas should be identified?

Not relevant to a Hamlet

Q 35. Are there any existing employment areas that could be reallocated to other uses?

In Woolverstone there will be new employment facilities included in the development of Home farm.

Q 36. Should we identify areas where non-B class uses, such as car showrooms, tyre and exhaust centres and building material stores, can be located?

Not in Woolverstone

Q 37. Should there be a policy that allows a wider range of uses than just B class on all employment sites or selected employment sites?

We do not know

Q 38. Should we allocate more than enough land to meet the forecast needs to enable more choice in the market and give flexibility to changing circumstances?

No

Q 39. Should we make specific employment provisions for small and medium sized enterprises? If so, how and where?

Yes

Q 40. If we expand, or allocate additional employment land where should these be?

Use of redundant farm buildings in rural areas

Q 41. What approach should we take to supporting new business formation across the Districts?

No views

Delivery: Town Centres and Retail (pages 50 to 55)

Q 42. Do you consider that any of the sites put forward as part of the Call for Sites should be allocated for retail or commercial leisure use? Please state why.

Not the ones in Woolverstone.

Q 43. Are there any other sites that should be considered for retail or commercial leisure use?

No

Q 44. If you consider allocations for retail development should come forward as mixed use, please provide details.

Not applicable

Options

Out of centre

OC1 – restrict out of centre retail development

OC2 – support out of centre retail development to meet capacity requirements

Town centres, primary shopping areas, primary shopping frontages and secondary shopping frontages

TC1 town centre and primary shopping areas

PS1 – primary and secondary shopping frontages

Impact assessment threshold

RIA1 – Impact assessment threshold as per NPPF

RIA2 – Impact assessment threshold

Q 45. Do you agree with the proposed Town Centre boundaries, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages? If not, please explain why.

For others to comment

Q 46. Do you agree with the approach to not define Primary Shopping Area boundaries within settlements other than the three main towns? If not, please explain why.

For others to comment

Q 47. Do you agree with the approach to maintain and increase retail provision within the District Centres? If not, please explain why.

Yes because they are the logical locations.

Q 48. Do you agree with the proposed thresholds relating to the mix of uses within Primary Shopping Frontage? If not, please explain why.

No comment

Q 49. Do you agree with the proposal to require an impact assessment for all edge of centre and out of centre retail proposals that are 400sqm gross floor space or more? If not, please explain why.

Yes, it must be an obvious requirement and such an assessment must be done by a competent independent body

Q 50. The Councils propose to protect A1-A5 uses in Core Villages and Hinterland Villages, and in local centres within towns. Do you consider this to be the correct approach?

Yes

Delivery: Biodiversity (pages 56 to 57)

Options

BIO – protection of designations, habitats and species

BIO2 – protection and enhancement of designations, habitats and species

Q 51. Do you have views on the Option BIO 1 and/or BIO 2?

Yes, very strong views. Woolverstone is one of several villages located on the Shotley peninsula. Much of the peninsula is covered by a designated AONB and as such protects the natural habitat. Within this there are SSSI, SPA and RAMSAR sites. The ecology of this whole area is an integral part of the unique Suffolk Coast and Heaths and should be treated as such in the development of the Babergh and Mid Suffolk local plan. This peninsula should therefore theoretically be treated as an integral part of Suffolk Coast and Heaths AONB. It is extraordinary that it is not.

Delivery: Climate Change (pages 58 to 61)

Options

Flood risk

FR1 – flood risk – leave to NPPF to provide policy framework

Renewable energy

RE1 – renewable energy – leave to NPPF to provide policy framework

RE2 –renewable energy policy

Sustainability standards

BS1 – building sustainability – include sustainability standards

Q 52. How should the local plan consider the impact of renewable technologies? What types of effects should be assessed within the policy criteria?

In principle we support the adoption of renewal technologies but these must be the subject of independent assessments to establish impacts.

Q 53. Do you support the Council's initial preference to include water efficiency measures in new build? If not, please explain why?

Yes

Q 54. Are there any other additional environmental standards Babergh and Mid Suffolk should be requiring? If so, please provide details and reasons why.

Full acknowledgement of the existence of the Woolverstone Village as a Conservation Area and the existing AONB, SSSI, RAMSAR, SPAs etc. and a determination to retain and enhance them.

Furthermore, Babergh and Mid Suffolk should have a clear plan for increased flood risk as a result of global warming over the next 20 years and avoid siting development not just on flood plains but also where access roads are increasingly liable to flooding. For example, B1456 along the Strand from Wherstead – the gateway to the Shotley Peninsula - which is already a flood risk and incidents will increase with rising sea levels.

Delivery: Landscape, Heritage & Design (pages 62 to 64)

Options

L1 – maintain local landscape designations

L2 – remove local landscape designations and apply a criteria based policy

HA1 – protection of non-designated heritage assets

Q 55. Are there any other approaches that the Joint Local Plan could take to protect the landscape?

Re-balance the proposals for growth so that these are centred on sustainable locations, close to transport nodes and not targeted on rural areas. To recognize that high quality agricultural land should not be sacrificed to housing. Recognise that rural areas are not just visual locations but also prone to degradation through noise – of traffic – in particular. To recognise that tranquility, natural beauty, wildlife and a rural environment are why many people elect to live in the countryside. This is being eroded by the creeping urbanisation of the current policy of building in rural areas. It seems at odds with the importance given in the last two years to the tourist possibilities on the Shotley peninsula. The drive to increase rural housing so massively on the peninsula increasing the population by over 2000 on present developments tourism may well kill off the reason why people choose to visit areas of beauty and wonder.

Q 56. Should additional protection be given to areas which form part of a landscape project area but which aren't designated?

Yes. The majority of the village of Woolverstone is located within its own Conservation Area. This was designated in 1989 and a further appraisal adopted by Babergh District Council Strategy Committee in September 2008. That Woolverstone was worth protecting is acknowledged by this designation. It is a rare example of a 19th Century estate village with value in both its architecture and the spaces in between buildings centred on Woolverstone Hall. There are 18 listed buildings in Woolverstone. There are Tree Preservation Orders on all trees throughout the village. Within the settlement there are a number of plots that have the status of Areas of Visual or Recreational Amenity which protects these areas from infill. As mentioned before, the Shotley Peninsula is the only location of Ancient Estates Farmlands in Babergh. The mixture of fields and woods are unique. The agricultural land surrounding Woolverstone is high quality land Grade 2 i.e. considered to be the best and most versatile land. *“The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 together form about 21% of all farmland in England”* TIN049 edition 2 - Agricultural Land Classification: protecting the best and most versatile agricultural land,

Q 57. How can the Joint Local Plan make the most of the heritage assets?

The Village has many heritage assets. The majority of the village of Woolverstone is located within its own Conservation Area. This was designated in 1989 and a further appraisal adopted by Babergh District Council Strategy Committee in September 2008. That Woolverstone was worth protecting is acknowledged by this designation. It is a rare example of a 19th Century estate village with value in both its architecture and the spaces in between buildings centred on Woolverstone Hall. There are 18 listed buildings in Woolverstone. There are Tree Preservation Orders on all trees throughout the village. Within the settlement there are a number of plots that have the status of Areas of Visual or Recreational Amenity which protects these areas from infill. As mentioned before, the Shotley Peninsula is the only location of Ancient Estates Farmlands in Babergh. The mixture of fields and woods are unique. The agricultural land surrounding Woolverstone is high quality land Grade 2 i.e. considered to be the best and most versatile land. The Joint Local Plan must recognise the importance of retaining the integrity of these heritage assets

Q 58. What level of protection should be given to identified non-designated assets? Are there any specific situations in which the balance should favour or not favour protection of identified non-designated assets?

We have covered our response to this in Q57 above

Q 59. Should a more flexible approach toward climate change objectives be adopted where this would assist in protecting a heritage asset?

Yes definitely

Q 60. Is there any aspect of design that priority should be given to?

Difficult one to answer in a vacuum

Q 61. Is there any aspect of design that should be introduced to the Councils' policies?

Another difficult question to answer in a vacuum

Q 62. Is there an area of design related to past development that you consider needs to be addressed in future development?

Yes, the ongoing enforcement issues with the Walled Garden (Grade 2 listed historic asset) development and the failure of the Babergh to have an effective Enforcement Team.

Delivery: Infrastructure (pages 65 to 58)

Options

INF1 – leave to NPPF to provide the policy framework

INF2 – to have a strategic infrastructure policy to manage infrastructure provision in the locality to supplement the NPPF addressing issues of cumulative growth and education provision.

Q 63. Which option do you consider most appropriate? Please explain why?

INF2 for the reasons outlined below. The Suffolk County Council must sign off any strategic infrastructure policy. We see little evidence of holistic planning at the present time.

Q 64. What do you consider the key infrastructure issues in your community?

Transport

- The B1456 is a road under pressure. In Woolverstone in one place the road is less than 5 meters across and the pavements less than a metre wide. Two coaches/lorries/tractors can't pass each other. Wing mirrors extend over the pavement and pedestrians are in danger from passing vehicles. Woolverstone does not have a footpath that runs the length of the village. Not all the village is with the 30 mph limit. Increasing traffic along the B1456 still further will increase the severance for the communities along its route. It will also increase the level of noise nuisance, damage to buildings close to the road and see a deterioration in the quality of living. We are already suffering from excessive speeding and have a Safe Cam and Community Speedwatch team trying to address this. However, none of this mitigates the impact of increasing volumes of traffic.
- Freston crossroads are currently considered unsafe. The bus stop at the junction has been demolished three times in the last ten years. The Ganges development at Shotley was supposed to bring improvements to the roundabout; however, this has not taken place. In the meantime the most recent Holbrook housing development at Admiral's Quarter has gone ahead on the understanding that Freston Crossroads is not an issue, as it will be improved. It is of great concern that the infrastructure improvements are not keeping pace with the housing developments. The new houses granted permission at Stutton will add extra pressure on this hazardous junction
- The Ganges development TA shows that the roundabout at Wherstead will be over capacity in the morning peak period. Again, there were supposed to be improvements to cope with excessive traffic at this point. Ipswich High School is now under new ownership and wanting to increase numbers and users putting even more pressure on this junction. Further housing development on the Shotley Peninsula will also increase this pressure.
- The designation of Chelmondiston and Shotley as Core villages gives rise to even more concern. The vast majority of traffic emanating from the increased development that Core village status will attract will travel through Woolverstone on the B1456 increasing the noise, pollution, severance and vibration villagers already have to suffer. We believe that planners should take into account the impact of these cumulative developments – a further 880 dwellings proposed on the Shotley peninsula - on settlements along the Main Road.

Healthcare

An increase in population of 2000+ on the Shotley peninsula will put a strain on the two doctor's surgeries; one located at Shotley the other at Holbrook. The current surgeries will need to expand, increase number of doctors and offer more services. Where would it be most appropriate to expand/build? This would be best decided on a whole peninsula basis.

Power

The Shotley Peninsula does not have a secure electricity supply. There have been many outages over the past three years. Furthermore, there is no gas supply onto the Peninsula so electricity and oil are the only

two viable alternatives making rural life more expensive. The infrastructure that delivers the electricity needs improving now before an estimated 900 new houses are built on the Peninsula.

Communications

In many parts of Woolverstone there is a poor mobile phone signal and people have to rely on landlines. In many parts of Woolverstone there is a poor mobile phone signal and people have to rely on landlines. As referred to in Q 12, there is a fast broadband cabinet in the village. However, it is not available to everyone in the village and will not be in the foreseeable future. Woolverstone village is nearly a mile from end to end. The “fast fibre” cabinet is close to the exchange but remote from the Western end of the village, over a mile away. This is the measurement that BT uses which dictates that fast BB is not available at a home that is more than 1 mile from the exchange. Broadband speed drops the further away from the cabinet. Also, there is only copper cable connection from home to cabinet (FttC) which makes this even slower the further from the cabinet. Residents at the Western end of the village do not benefit from super-fast broadband. Furthermore, we have a great number of residents who have no broadband/computer access at all.

Broadband

As referred to in Q 12, there is a fast broadband cabinet in the village. However, it is not available to everyone in the village and will not be in the foreseeable future. Woolverstone village is nearly a mile from end to end. The “fast fibre” cabinet is close to the exchange but remote from the Western end of the village, about 2km away. Broadband speed drops the further away from the cabinet. Also, there is only copper cable connection from home to cabinet (FttC) which makes this even slower the further from the cabinet. Residents at the Western end of the village do not benefit from super-fast broadband. Furthermore, we have a great number of residents who have no broadband/computer access at all.

Buses

The bus service is poor and has just been reduced further (effective 30 October 2017) with the 202, 98 and 98A being taken out of service and being replaced by 97 and 98. Number of bus trips reduced from 11 to 9. Only two morning peak hour buses to Ipswich Mon to Sat: 07.41 and 8.43. The last bus from Ipswich Mon – Sat is 18.30. There is no evening bus service which means anyone leaving the peninsula has to do so by car. There is a limited bus services on Sundays with 4 trips up and down the Peninsula. Having a bus stop does not mean you have an adequate service.

Q 65. What infrastructure issues do you consider to be a priority for the future?

We require adequate roads and road loading. The B1456 is a narrow twisting road with a 40 mph speed limit in long sections. Not all our village of Woolverstone is included in the village 30 mph zone – 7 houses are outside this and subject to speeding traffic. Accessing houses onto a winding road with limited visibility into speeding traffic is hazardous. Recently a BDC Councilor refused to deliver leaflets to these houses, as he felt so unsafe. Within the 30 mph zone there is persistent speeding. The village suffers from severance issues as a result and children are unsafe on bicycles. We do not have a footpath that runs the length of the village. Walking on the road is unsafe.

On the B1456 as a whole there are capacity issues with continued development. Freston crossroads is an unsafe junction and needs improving as a matter of urgency.

Electricity security needs improving. Mobile phone signal needs improving.

Q 66. What infrastructure do you think would be needed to support the growth scenarios?

The proposed growth scenario requires significant mitigation of impacts in rural villages not just white gates to mark village boundaries. Growth should only be promoted in sustainable locations.

Q 67. What comments do you have on the proposed strategic approach to infrastructure delivery?

Any infrastructure requirements should be in place before development. We see a lag and even lack of infrastructure when developments go ahead. For example, Admiral's Quarter in Holbrook has gone ahead relying on the proposals to change Freston crossroads laid out in the Ganges development agreement. However, the Ganges development is not proceeding at any pace; so there has been no change at the crossroads.

Q 68. Should a separate policy be developed to manage provision of education and healthcare?

All the future infrastructure demands from proposed developments should be planned together so there is joined up thinking for the peninsula as a whole.

Delivery: Healthy Communities (pages 69 to 72)

On site open space – residential developments

OS1 – set a prescriptive requirement for on-site provision

OS2 – relate requirements to identified needs

On site open space – non-residential developments

NROS1 – leave to NPPF to provide policy framework

NROS2 – non-residential uses – include policy

Protection of existing spaces

POS1 – leave to NPPF to provide policy framework

POS2 – protection of open spaces – include policy

Protection of Community spaces

CF1 – leave to NPPF to provide policy framework

CF2 – protection and provision of community facilities

Q 69. Should the strategy of the Plan be focussed on addressing deprivation?

Yes in part

Q 70. Are there any specific approaches that should be applied to address deprivation?

This is a very complex issue requiring debate to establish deliverable solutions

Q 71. Are there any other circumstances and/or provisions under which open space, sports facilities or community facilities should be required and/or protected?

Difficult to respond in a vacuum

Q 72. Through the Plan should any other areas of Local Green Space be identified and protected?

There should be an audit of Local Green Spaces in each village/settlement. BDC should keep an overview.

Q 73. Are there any specific facilities that should be included in the definition of community facilities?

Place: Functional Clusters (page 74)

Q 74. Do you consider the approach to identifying functional clusters appropriate for Babergh and Mid Suffolk? If not, please explain what would be your preferred approach?

The Shotley Peninsula has been identified as a unique area of landscape: *“It should be noted that the Ancient Estate Farmlands is only found on the Shotley Peninsula. The fertile and easily worked soils created from windblown glacial soils are both fertile and easily worked, therefore the area was very attractive to early farmers and holds a very high density of Neolithic and Bronze Age sites and remains. The land continued to be prized for its fertility and has been modified and “modernised” on successive occasions. This combination of a long period of cultivation and the focus on “agricultural improvement” has created a landscape with a pattern of rectilinear “modern” fields (18th – 19th C), scattered with blocks of Ancient Woodland, (woodland known to pre-date 1600), that are more usually found in the “ancient” countryside of the claylands”* Joint Babergh and Mid Suffolk District Council Landscape Guidance August 2015

We believe there should be a Development plan that takes into account the entirety of the Shotley Peninsula. The proposal that something above 11% of housing development can be sited on the Shotley Peninsula relative to Babergh as a whole is entirely disproportionate to the area and pays scant regard to the infrastructure requirements. The population increase of over 2000 persons on the Peninsula will raise grave concerns about the road network, healthcare, education provision etc. but also risks spoiling the beauty and uniqueness of the area.

We feel that Shotley Peninsula should be treated as a whole rather than piecemeal.

Place: Settlement Boundaries (pages 75 and 76)

Option

Settlement boundaries

BND1 – review and designate boundaries for all settlements above a threshold of 10 dwellings adjacent to our fronting an existing highway

Q 75. Do you consider the proposed new settlement boundaries to be appropriate? (Please explain your answer)

The revised settlement boundary for Woolverstone we consider to be inappropriate. The extension eastwards to include the buildings around the Walled Garden development is inappropriate because when this development was granted planning permission it was done so under the express consideration that this area, also in the ANOB, could only be built in because it would preserve the Grade 2 listed Walled garden and associated structures. It was never the intention that it should, over time, to be included in the Village Settlement Boundary. Further, this would increase pressure for further development within the Walled Garden which has been expressly and statutorily rejected in two section 106 agreements. The Walled Garden development should remain as “countryside” within the Suffolk Coasts and Heaths ANOB.

Q 76. Are there any other settlements that should be given new settlement boundaries? (Please explain your answer)

Not that we are aware of.

Q 77. Is the threshold (10 well related dwellings) for identifying settlement boundaries appropriate?

Yes, probably

Place: Potential Land for Development (page 77)

Q 78. Do you consider the sites identified to be appropriate for allocation or inclusion within the settlement boundary? (Please explain why and quote the settlement and site reference numbers i.e. SS0001)

Both Woolverstone sites listed in the Local Plan Consultation Document are outside the proposed the proposed settlement boundary. As already indicated, we dispute the settlement hierarchy score that has been allocated to Woolverstone. We have calculated we should be classified as a Hamlet. Despite this we do have some comments on each of the listed sites although as a Hamlet these areas would not have been listed or considered.

Site reference SS0255

- This is a Greenfield site and was a glebe field: always used solely for agriculture.
- The land is Grade 2 listed, some of our finest, most productive arable land.
- Any development would require the lifting of a covenant and consent of St Edmundsbury Diocese, not Ipswich, as neighbours and covenanters
- The part of the field identified for development is within Woolverstone Conservation Area and adjacent to the ANOB

This site was rejected for development in 2016 SHELAA as “inadequately related to services, facilities”. The site has not changed only the methodology.

Site reference SS0203

- This is a Greenfield site and has always been used solely for agriculture.
- Land is Grade 2 listed, some of our finest, most productive arable land.
- The part of the field identified for development is within Woolverstone Conservation Area and adjacent to ANOB
- This site was rejected for development in 2016 SHELAA as “inadequately related to services, facilities” The site has not changed only the methodology.

Q 79. Are there any other sites/areas which would be appropriate for allocation? (If yes, please provide further information and complete a site submission form)

The three redundant farm building/brownfield sites in Woolverstone: White House Farm, Home Farm, Dairy House are all good examples of sensible rural growth and will provide 12 new dwellings in the village without taking out prime agricultural land and spoiling rural vistas and the layout of the Woolverstone estate village. This is an increase of around 10% in housing terms and is sufficient expansion of the village.

Place: Community Choice & Neighbourhood Plans (page 78)

We intend to start the process of a creating a Neighbourhood Plan as soon as is practically possible.

This was agreed at a meeting of Woolverstone Parish Council on Thursday 9th November 2017.