

Babergh & Mid Suffolk Joint Local Plan Preferred Options: Consultation Document

Woolverstone Parish Council's response
September 2019.

We have chosen to respond in this format rather than through the interactive channel on the Babergh website because we found the site difficult to navigate, difficult to interact with and impossible if you do not have a computer as many in our village do not. Furthermore, it is extremely difficult to work as a team in this way. Furthermore, this format allows us to present a holistic response that demonstrates a village under pressure and the challenges of desk-bound assessments on real issues more easily.

Objectives

Building the right type of housing in the right place to meet the identified need is the right objective (i). 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 within our village and on the Shotley Peninsula. Currently "affordable" homes are "anything but affordable" for the majority of Babergh residents. The environmental objectives (v) need to be matched by appropriate actions and planning. Furthermore, housing developments need to be built only in appropriate sustainable locations and avoid creeping urbanization of our countryside. Additional housing on Shotley Peninsula will exacerbate difficulties with delivering healthcare (vi).

In more detail, we see preserving and enhancing our wonderful natural and historic heritage as a vital objective. Once it has gone we are never going to get it back again. The Local Plan needs to identify areas for housing that minimize 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. The cumulative impact of increasing numbers of houses on the Shotley Peninsula needs to be assessed as every additional house will produce increased pressure on the B1456 which will be over capacity at the Wherstead roundabout when Ganges is built out and bring a 30% – 40% increase in traffic through the villages of Wherstead, Freston, Woolverstone, Chelmondiston and Shotley Street. This impact will be even greater considering the additional developments proposed in the SHELAA (2019). We believe BDC should identify the type of housing needed within communities rather than what developers would like to build at most profit to them.

Shotley Peninsula. The approach to the Shotley Peninsula alongside the River Orwell is heart-lifting and joyful. On the Peninsula itself there are quiet, winding lanes, small fields, ancient woodlands and due to 200 years of limited development between 1776 and 1937 a sense of order and tranquillity that is simply not present in many other areas. There is almost a disconnectedness – which is treasured by those who seek to explore it. The cumulative impact of development on the rural community will fail to protect its uniqueness.

Indeed, 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

Most of the Shotley Peninsula is within Suffolk Coasts and Heaths AONB. 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.

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, the estate buildings are still in clear evidence and it retains its shape; a rare example of a carefully planned and “closed” estate. The “open character” of the village is central to the Conservation Area. Pairs of semi-detached cottages with large gardens allowed labourers to grow fresh vegetables and keep a pig or two. In a recent Appeal decision from the Planning Directorate (APP/D3505/W/18/3214989) it was noted that this open character “contributes positively to the character of the conservation area and are important to its significance”. Any loss of this “open character” would have an adverse impact on the character and appearance of our Conservation Area. 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. The Mean vehicle speed through Woolverstone (2018) is just under 40mph in the 30 mph zone with some vehicles travelling in excess of 50 mph. Severance is severe for elderly. This is before the impact of a 30%-40% increase of traffic through the development at former HMS Ganges and Shotley Marina and any further development “down the road” on the Peninsula. 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 1 and 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)

The majority of the village of Woolverstone is located within its own Conservation Area. (*“Woolverstone Conservation Area Appraisal” 2008.* This was designated in 1989 and a further appraisal adopted by Babergh District Council Strategy Committee in 18th September 2008. Babergh has a statutory duty to “preserve and enhance” the CA. 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 or structures 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 should protect 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 1 and 2 i.e. considered to be the very best and most versatile land in the country. *“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.

We are pleased to see that Babergh District Council have reviewed the settlement hierarchy score for our village, Woolverstone, and have found it indeed to be a **hamlet**. Therefore we expect that the policy on Hamlets LP01 will be applied to all planning decisions. Woolverstone is poorly related to facilities and services having no shop, no pub, no school, no doctor’s surgery and a poor bus service which is currently under review.

We are a Neighbourhood Plan Area. We signed up to this because we thought it would give us a much stronger role in shaping the development of our village. We thought it would enable us to protect the things we value most – our heritage assets, unique estate village layout and historic landscapes. We thought it would allow us to encourage developers to build what we believe our community needs and wants - such as greater numbers of affordable houses or housing more suited to elderly residents. We believed that through our Neighbourhood Plan would say where and what type of development should happen. It turns out these were empty promises. The *Joint Local Plan - Preferred Options* consultation document is clear that Babergh District Council would appear to want **to impose** upon us a minimum number of 31 housing units, their density and where they should be placed. We challenge that view.

With just current permissions, Woolverstone will have an additional 13 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 and 1 new build at the Dairy House. This is in addition to the four new builds recently approved at the Walled Garden (Grade 2 listed) of which three have been built out. This is an additional 17 houses in Woolverstone – a hamlet of 107 dwellings. When these houses are built they will represent an increase of about 16% 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. We have taken our fair share.

There is no justification for this housing demand locally. Public transport is not viable and sustainable in Woolverstone. Every new house proposed will be dependent on car usage. The scale, density and location of the proposed sites would result in landscape harm within our Conservation Area and undermine the open character and rural setting of the village. Such new developments would not constitute sustainable development. Whereas the developments from current permissions would at least utilise redundant farm buildings and not high-value greenfield sites.

Is this proportionate?

- There are 74 hamlets in Babergh.
- There are 143 Outstanding Planning Permissions (at 01/04/18) in hamlets. Woolverstone is taking 11% of this number.
- 118 new homes are proposed in Hamlets. If all were built then Woolverstone will be asked to absorb 13% of the total.

- In all Woolverstone is being asked to take 24% of all building in Babergh's hamlets. This is totally disproportionate; it would increase the size of this village which lacks sustainable services and facilities by roughly 30%.
- Furthermore, it is highly likely that all the occupants of the proposed houses would be reliant on car travel.
- It is also highly likely that none of the houses will reflect local need.

Types of housing

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.

In Woolverstone any policy compliant development should be of smaller homes, e.g. 1 or 2 beds, for youngsters and older people "downsizing". We have too many "executive" type homes already. Many older people in our village would like to see more housing suitable for independent elderly people which would 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.

Environment

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. The remainder of the Peninsula is AONB project area. 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 entire Peninsula should therefore theoretically be treated as an integral part of Suffolk Coast and Heaths AONB. It is extraordinary that it is not.

In the local plan there should be a 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, preserve and enhance them.

Furthermore, the Local plan recognises that high quality agricultural land should not be sacrificed to housing. The Local Plan must act on this. The Local Plan must recognise that rural areas are not just visual locations but also prone to degradation through noise and pollution— of traffic – in particular. To recognise that tranquillity, 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. Indeed, 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 development figures, may well kill off the reason why people choose to visit areas of beauty and wonder.

Key infrastructure issues in our community

Transport

- The B1456 that runs the length of the Shotley Peninsula is a road under pressure. In Woolverstone in one place the road is less than 5 metres 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. In 2004 the weekday count for all vehicles was 4,148. In 2018 the weekday count was 6,542, an increase of 57%. It will also increase the level of noise nuisance, damage to buildings close to the road and see 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. Driving through this junction at peak times is hazardous in reasonable conditions let alone in adverse conditions.
- 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 Holbrook 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 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; four or five in this year alone. 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 hundreds of 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. 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.

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. The Sunday bus service has been withdrawn. Having a bus stop does not mean you have an adequate service. The 98 bus service is to be reviewed by SCC.

Roads

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, with no footpath and subject to speeding traffic. Accessing houses onto a winding road with limited visibility into speeding traffic is hazardous. Recently a retired BDC Councillor 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.

New settlement boundaries

The revised settlement boundary for Woolverstone we consider to be inappropriate. SP03 (C). 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 condition** that this area, also in the AONB, could only be built in because it would preserve the Grade 2 listed Walled garden and associated structures. This was an enabling planning permission to preserve the heritage assets of the Walled Garden. It was never the intention that it should, over time, be included in the Settlement Boundary. Careful examination of the original settlement boundary shows that it runs to the southeast of the Walled Gardens structures. Enabling developments should avoid (a) “detrimental fragmentation of management of the place” *English Heritage*. Furthermore, it will (b) “secure the long-term future of the place”. (f) The amount of enabling development is the minimum necessary” and (g) “the public benefit...decisively outweighs the disbenefits of breaching other public policies”. There are currently enforcement measures being pressed against the site owner for breaching the newly signed Section 106 agreement and Planning Permission. Failure to protect this area by returning to the original boundary will 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. There is no argument we can find for this change within the documents provided.

The extension of the Settlement Boundary to the South of the Main Road in two places has been undertaken purely to match the land put up for development within the call for sites and subsequent SHELAA: **SS0255** and **SS0203** and to meet the housing targets. However, Woolverstone sites listed in the Local Plan Consultation Document were initially outside the settlement boundary. Both sites are within the Conservation Area and any development in either site will destroy the “open character” of the village.

Site reference **SS0255**

- This is a Greenfield site and was a Glebe field: always used solely for agriculture.
- The land is Grade 1 and 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 irony should not be lost that the covenant purports to protect this land from any development.)
- The part of the field identified for development is within Woolverstone Conservation Area and adjacent to the AONB

This site was rejected for development in 2016 SHELAA as “inadequately related to services, facilities”. It remains so. The site has not changed only the methodology. Since its first re-designation the number of houses proposed has increased from 2 to 5. The density proposed of 5 dwellings in .2 hectares is totally inappropriate for its location within a Conservation Area and seems to contradict the Local Policy for Hamlets LP01 or Environmental Protection LP16, Landscape LP18, Area of Outstanding Natural Beauty LP19 and Historic Environment LP20. The proposed development would degrade the historic layout created by the Woolverstone Park estate which should be protected as part of a Conservation Area and AONB Project Area. It does seem extraordinary that land across the road i.e. five metres away (SS0202, SS0538, SS1180) is rejected: “Development of the site likely to have a detrimental impact on sensitive landscapes which cannot be mitigated.”

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 AONB

This site was rejected for development in 2016 SHELAA as “inadequately related to services, facilities” It remains so. The site has not changed only the methodology. Since its first re-designation the number of houses proposed has remained at 10 in .6 hectare. The density proposed is totally inappropriate for its location within a Conservation Area and seems to contradict the Local Policy for Hamlets LP01 or Environmental Protection LP16, Landscape LP18, Area of Outstanding Natural Beauty LP19 and Historic Environment LP20. The proposed development would degrade the historic layout created by the Woolverstone Park estate which should be protected as part of a Conservation Area and AONB Project Area.

It does seem extraordinary that land across the road i.e. five metres away (**SS0202, SS0538, SS1180**) is rejected: “Development of the site likely to have a detrimental impact on sensitive landscapes which cannot be mitigated” specifically to site **SS0203** and by extension to the sensitive landscape around site **SS0255**.

We believe that the inclusion of these sites totally contradicts the proposed New Joint Local Plan policy LP01 - Hamlets and Clusters of development in the countryside, as well as the NPPF. *Proposals for new dwellings located within small clusters of housing may be acceptable, subject to satisfying the following criteria: a. Where it would not be detrimental to the character of the surroundings; b. The scale of development consists of infilling by one dwelling or a pair of semi-detached dwellings within a continuous built up frontage; c. It would not cause undue harm to the character and appearance of the cluster or any harmful visual intrusion into the surrounding landscape; an, d. Particular care will be exercised in sensitive locations such as conservation areas and the Area of Outstanding Natural Beauty and any other designated land.*³ *Proposals which would consolidate sporadic or ribbon development or the infilling of large gaps or extending edges, will be resisted. The cumulative impact of proposals will be a major consideration as development should be proportionate to the location and context, having regard to the level of local infrastructure provision.*

By contrast, the use of 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 16 new dwellings in the village without taking out prime agricultural land and spoiling rural vistas and the layout of the Woolverstone Park estate.

Shotley Peninsula

We believe there should be a Development Plan that takes into account the entirety of the Shotley Peninsula. It is incredibly difficult due to the paper trail to calculate the total number of dwellings approved and built, not built and with potential to build on the Shotley Peninsula. However, 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 argue that Shotley Peninsula should be treated as a whole rather than piecemeal.

This response was agreed by Woolverstone Parish Council 26th September 2019.