

Dear Samantha

DC/20/03247 | Full Planning Application - Erection of phased development of 22no. dwellings, creation of cycle path links to Holbrook and Chelmondiston, improvements to Berners Hall car park, provision of public open space and landscape enhancements. | Sites And Cycle Paths Woolverstone To Holbrook, Woolverstone To Chelmondiston Main Road Woolverstone Suffolk.

Thank you for giving us the opportunity to respond to this major planning application in our village.

Woolverstone Parish Council objects in the strongest terms to the proposal for building 22 houses within and adjoining our village boundary.

Introduction

Woolverstone is a rare example of a 19th Century estate village with value in both its architecture and the spaces in between buildings centred on the 18th century Woolverstone Park estate. There are 18 listed buildings or structures in Woolverstone. There are Tree Preservation Orders on all trees throughout the 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 the estate village retains its shape; a rare example of a carefully planned and "closed" estate.

The majority of the village of Woolverstone is located within its own Conservation Area which was designated in 1989. A further appraisal was adopted by Babergh District Council Strategy Committee on 18th September 2008. See "*Woolverstone Conservation Area Appraisal*" 2008. Babergh District Council has a duty in law to "*preserve and enhance*" conservation areas within its district as well as the sensitive landscape areas. That Woolverstone is worth protecting is acknowledged by this designation. There is a duty to see this designated Conservation Area protected and enhanced by planning policies and not degraded by development that run contrary to existing policy.

The "open character" of the village is the essence of the Conservation Area. In a recent Appeal decision from the Planning Directorate it was noted that this open character and space "*contributes positively to the character of the conservation area and are important to its significance*"

(APP/D3505/W/18/3214989). Any loss of this “*open character*” would have an adverse impact and cause harm to the character and appearance of Woolverstone Conservation Area. Babergh Local Plan 2006 CN08 states: “*Proposals for ... the erection of new buildings in a conservation area or which have an impact on views into or out of a conservation area should...retain all elements and components, including spaces, which contribute to the special character of the area*”. The intention of this policy is clearly to protect sensitive and special areas from harmful development.

The busy B1456 runs through Woolverstone. To the north of the road the village is situated within the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty; to the South it is within the AONB project 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 especially severe for the elderly, those with young children in push chairs and dog walkers.

All 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.

Within Woolverstone there are a number of places that have the status of Areas of Visual or Recreational Amenity which should protect these areas from development. 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.

Specific points

1. We note that Babergh and Mid Suffolk District Council currently have a Housing Land Supply of 5.7 years (2019). And that this has increased to 6.64 years reported in consultation document this year (2020). It is not "fragile" as the applicant suggests. Therefore, Babergh and Mid Suffolk District Council's saved policies must be used in determining this application. The "*presumption in favour of sustainable development*" NPPF is not relevant in this case.
2. We also note that this is a "major" application which has an impact on the expectations for affordable housing set in current policies at 35% BDC's Core Strategy policy CS19 of the Babergh Local Plan 2011-2031 Core Strategy & Policies (Part 1 of the New Babergh Local Plan) February 2014 (CS). The "Viability report" demonstrates that the 20 out of the 22 proposed houses are not in any sense "affordable", although there is reported interest in one pair of houses on Plot 2 by a Housing Association.
3. Woolverstone is a Conservation Area designated in 1989 and appraised in 2008. Babergh and Mid Suffolk District Council have a statutory duty to "*preserve and enhance*" its appearance, character and setting.
4. Woolverstone is designated a "*hinterland*" village in BDC CS2. This, however, is an incorrect designation due to a clerical or arithmetical error which has since been corrected in the emerging Joint Local Plan, Settlement Hierarchy 2019.

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, was 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 over 15 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 have been awarded 0 points instead of the 1 point which was allocated.

5. The criteria score correctly applied shows Woolverstone’s status should be that of a “*hamlet*”. It is currently awarded 11 points making it a *hinterland* village whereas it should only receive a maximum of 8 points making it a *hamlet* or countryside village.

6. This has been accepted by Babergh District Council and in the emerging Joint Local Plan Woolverstone is correctly designated as a “hamlet”. P5

SETTLEMENT	Classification	Convenience Store	Post Office	Food & Drink outlets (Max. of 5 points)	Other Retail (Max. of 5 points)	Pre-School	Primary School	Secondary School/Sixth Form/Further Education	Strategic employment site within 5km	Small scale employment site within 5km	Village Hall	Place of worship	Permanent Library	Doctors surgery	Chemist / pharmacy	Dentist	Peak time bus service	Peak time rail service	Recreational Grounds / Play Area	Sport / Leisure Centre	Allotment	Super-fast Broadband	Standard Speed Broadband	Town / Urban Area within 5km	Core village within 2km	Score
Points Available		2	1	1	1	1	2	1	2	1	1	1	1	2	2	1	2	2	1	1	1	2	1	2	1	
Winston	Hamlet	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	0	0	0	0	1	0	1	5
Woolpit – Borley Green, Green, Heath	Hamlet	0	0	0	1	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	5
Woolverstone	Hamlet	0	0	0	0	0	0	0	0	1	1	1	0	0	0	0	2	0	0	0	1	2	0	0	0	8
Worlingworth	Hamlet	0	0	0	0	1	2	0	0	0	1	1	0	0	0	0	0	0	1	0	0	2	0	0	0	8
Worham – Maggie Green	Hamlet	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	1	0	0	3
Worham – Rectory Road	Hamlet	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Wyverstone	Hamlet	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	1	0	0	0	1	0	1	7

Appendix 1 Service and facilities matrix

Babergh and mid Suffolk Joint Local Plan

Regulation 18 consultation.

Topic paper – Settlement hierarchy review

July 2019.

(NB Despite the fact that the allotments are officially “closed” they have still been used in the calculation. While they exist on paper there is not allotment provision available for anyone in the village other than current holders. Neither is Super-fast broadband at present available for the whole village.)

7. Given that the designation of Woolverstone as a hinterland village was one made by arithmetical or clerical error and which has

subsequently been corrected in the emerging JLP it would be perverse to continue to treat Woolverstone as a "hinterland" village for the purposes of this, or any other, application.

8. Of further import is that:

- 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 number of residents who have no broadband/computer access at all.
- There is a limited bus service in Woolverstone. There are now only eight buses a day that travel through Woolverstone to Ipswich on a school day and only 7 buses on non-school day. There are 2 options in the morning, only one if a non-school day. Only two morning peak hour buses to Ipswich Mon to Sat: 07.41 and 8.08 NSD or 8.23 SDO. The last bus from Ipswich is at 17.45 in the evening. The last bus into Ipswich is at 18.38. There is no return bus service in the evening from Ipswich. There is no Sunday bus service at all. This is not the impression given by the applicant in their statement: "*There is a bus every one and a half hours*". The proposed cycle paths will not create a "*modal shift*". In reality, all the proposed households will be car dependent.
- The Public House referred to in the application, "The Loch and Quay" is a new venture. We wish it well but given that the previous four incarnations at the Marina have failed to thrive there is no evidence yet to suggest that this one will either. The Royal Harwich Yacht Club is a "Members Only" facility.

9. Woolverstone is a hamlet that is "*remote from services and facilities*".

10. BDC CS2 sets out the settlement strategy policy for the District: development will be directed sequentially to towns/urban areas, 'core villages' and 'hinterland villages'. In the countryside, outside those areas, development will only be permitted in "*exceptional circumstances subject to a proven justifiable need*".

BDC's policy for Rural Areas requires it to "*prevent development other than that required for agriculture and other essential operations that*

need to be located in the countryside." The reason is to "*ensure the locally distinctive rural characteristics are not lost.*" BDC CS Rural Areas 2.8.6

11. Woolverstone is not a "*sustainable*" location. There are few services and facilities in the accepted sense as indicated in the settlement hierarchy.

12. The proposed sites are not part of BDC's development plan.

13. The applicant has offered no evidence of "*exceptional circumstances*" required for building in the countryside. Nor has the applicant offered any evidence of "*a proven justifiable need*" as required under BDC CS2 either within the village of Woolverstone or its cluster.

14. Our Village Review and Questionnaire of 2016 showed a desire by the overwhelming majority of residents (95%) that the village should only grow in size by between 5 and 10 houses.

15. There are currently 106 houses in the village of Woolverstone but only 102 in the Parish of Woolverstone. The applicant proposes to build 22 houses within the village. This would see an increase in the size of the settlement of 21% not the 20% suggested by the applicant. This increase in size of a village by over one fifth and can hardly be described as "*small*" or "*proportionate*".

16. Moreover, this ignores the current planning permissions and building out within Woolverstone. There are 4 houses being constructed at Home Farm and 6 at Whitehouse Farm both on brownfield sites. A further house is being built in the Nursery Lane/Walled Garden development. A large building housing 50 boarders at Dairy House is currently under construction. The total increase in the size of Woolverstone, if this proposal were to be granted, would be 32%. This is not proportionate growth in an unsustainable location. This certainly is not "*a small proportionate increase*" as the applicant states.

17. Furthermore, the reality is that all these houses will be car dependent. It was noted that each houses in the application carries 2 parking spaces making a total of 44 additional cars in the village.

18. The principle of the development is unsupported by either BDC CS2 or CS11. The proposal:

- is not proportionate to the size of the village.
- does not address locally identified community needs
- does not address locally identified housing needs
- does not follow the sequential approach
- does not take into account cumulative impacts of development on the Shotley Peninsula
- does not meet a proven or justifiable need for housing
- there are very limited social and economic benefits
- there are limited services and facilities

19. Contrary to the statement in the application that all the proposed sites are "*adjacent to or within*" Woolverstone's BUAB. In fact all sites are outside the BUAB and only two sites are adjacent to BUAB. (Sites 2 & 3) See <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Woolverstone-AW.pdf>

20. Sites 2 and 3 are also within Woolverstone's Conservation Area.

21. All sites are greenfield sites used solely for agriculture and without any planning history. The land is Grade 1 or 2 listed, some of our finest, most productive arable land. Woolverstone Parish Council's Climate Emergency Policy requires the Parish Council to "Challenge the use of premium greenfield agriculture land for building". Site 3 was rejected for development in 2016 SHELAA as "*inadequately related to services, facilities*". We believe that this application fails on the sequential criteria test for site selection. (CS 11 iii)

Site specific

22. Site 1 is the historic entrance to the estate village and marks the start of the Conservation Area. Entering from Ipswich the Agent's House home of the Clerk of Works is on the left and Number 1 "High Road" is on the right with the beautiful gable end with decorative bargeboards. Building on Site 1 would detract and harm this historic entrance. Further, as noted in the Transport Report, traffic is already travelling at 40 mph towards Ipswich at this point after a blind bend. Residents in Numbers 1 - 4 already have a dangerous pull out onto the road.

23. Site 2 is within the Conservation Area and separated from the BUAB by the busy B1456. Home Farm, Grade 2 listed, is also across the road. Views from this site have been lost to the South west through the construction of two reservoirs. However, views from Home Farm to the South would be affected and development here would seal off a view through from fields to the east of Home Farm looking south and increase the solidity of the ribbon effect.

24. Site 3 is inside the Conservation Area and outside the BUAB. It is sited between three historic grade 2 listed heritage assets: Widows Homes, Berners Hall and our War Memorial. The space between the Widows Homes and Berners Hall has existed for one hundred and thirty years. It is at the heart of the open spaces that are the essence of the village of Woolverstone. This site was also rejected in SHEELA 2016 as "*inadequately related to services, facilities*". Nothing has changed.

Although the proposed development of site 3 would likely cause less than substantial harm to the nearby heritage assets by changing their rural setting and the experience of these assets as well as the spaces between them, any building between the Widows Homes and Berners Hall will diminish both heritage assets and, in the case of the Widows Homes compromise the setting to a great degree.

Any harm requires clear and convincing justification. We do not consider that this less than substantial harm is outweighed sufficiently by any public benefit perceived to be offered by the development for this harm to be set aside as it would alter the essential character of Woolverstone. In fact, the public benefits of this application are remarkably few in number.

25. Site 4 is outside the Conservation Area and entirely separate from the BUAB. Site 4 is in open countryside and a greenfield site. There are no exceptional circumstances for building here. This would interrupt the views across the historic landscape of fields and woods towards Freston and Holbrook from the Widows Homes and Berners Hall. The site is on a sharp, tight bend with limited visibility. There have already been traffic issues close to this site. Indeed, the cottage just below this site has recently had its driveway widened following an incident with a beet lorry using this narrow and twisting single track road. Further down the lane there are examples of where close calls between vehicles travelling at

excessive speed given the nature of the road have collided with fences. The "informal" passing places have got more prolific given the increased traffic to Harkstead.

26. Site 5 is outside the Conservation Area, entirely separate from the BUAB. Site 5 is in open countryside and a greenfield site. There are no exceptional circumstances for building here. Development on this site would not be "infill" as described in the application. In fact there is a large gap between "April Cottage" and "Maytrees" on Harkstead Lane. Infill is usually a term used for urban development not building in the countryside in a partially wooded field some way between two houses. Development here should be protected by Babergh District Council's policies for building in the countryside.

BDC's policies for building in the countryside are specifically designed to exclude speculative housing for people not involved in agriculture.

Response to the Applicant's Transport Statement

27. The Transport Statement is not adequate and is incomplete. The dates for the data run from Friday 5th July 2019 to Thursday 11th July. Ipswich High School Summer Term ended on Friday 5th July so the following week's data does not include traffic to and from the High School. Even on Friday 5th the picture is incomplete as the year 11 and Year 13 students had already left school reducing by at least 1/5th the traffic generated by Ipswich High School.

28. In addition, there is no mention anywhere in the report of the increase in traffic on the B1456 to come in the next five years. This proposed development cannot be assessed independently of the other developments on the Peninsula. Government guidance states a Transport Statement "*should include an assessment of trips from all directly relevant committed development in the area*" Gov.Uk Guidance: travel plans, transport assessments and statements. The former HMS Ganges development is a "*committed development*" which will have massive impact on the B1456.

29. 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. On some stretches, wing mirrors extend over the pavement and pedestrians are in

danger from passing vehicles, for example between site 1 and site 2. At other locations in the village the B1456 is at its narrowest and just recently a tractor veered off the road through a historic wall and into a front garden when a tanker was approaching in the opposite direction.

30. The additional traffic generated by the development of former HMS Ganges alone would mean the link capacity of the B1456 during the AM Peak period (8.00 – 9.00) would be under pressure. So, too would Freston Crossroads and the Wherstead roundabout. Moreover, this figure does not include the developments given permission on the Shotley Peninsula since 2016 in Woolverstone, Chelmondiston, Erwarton and Shotley Gate

31. Increasing traffic along the B1456 still further will intensify 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%. When the development at former HMS Ganges is built out data anticipates a weekday count of well over 7,500 vehicles a day. A 44% increase in the AM peak and 61% increase in the PM Peak. (APP/D3505/V/05/1185675) This will also increase the level of noise nuisance, damage to buildings close to the road and see deterioration in the quality of living. We expect further severance within the village. 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.

It is also important to note at this point that in certain circumstances the 'Environmental Capacity' of a road should be considered alongside its physical capacity. As is outlined in sec. 32.4 of the document 'Transport in the Urban Environment' (IHT, 1997) the capacity of a road, when giving consideration to environmental conditions, is likely to be considerably less than it's measured physical capacity. The above document states that when determining the environmental capacity of a road '...local factors, such as frontage activity, conservation area designation and the location of schools and hospital, would also play a part.'

32. The 22 houses that are proposed will be heavily reliant on the private motor car and should be seen as part of the cumulative impact of increased traffic on the B1456. Even an increase of a further 44 vehicles a day and 88 trips a day adds additional pressure to the B1456

road system. It is already difficult for residents who front onto the B1456 in Woolverstone to pull onto the road at peak times given the speed and volume of traffic through the village. This proposal will add to the number of car dependent households in Woolverstone while BDC policy should "*seek to minimise the need to travel by car*" BDC CS 15.

33. Freston crossroads are currently considered "unsafe" (Bob Leonard SCC 23.08.2007). 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.

34. 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. On a school day at 3.45 pm traffic is close to a standstill from Wherstead roundabout backed up to the Orwell Bridge on occasions and a continuous stream along the Strand. Further housing development on the Shotley Peninsula will also increase this pressure.

35. 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. Planners are required to take into account the impact of these cumulative developments on settlements along the Main Road.

36. It is also important to note that in certain circumstances the 'Environmental Capacity' of a road should be considered alongside its physical capacity. As is outlined in sec. 32.4 of the document '*Transport in the Urban Environment*' (IHT, 1997) the capacity of a road, when

giving consideration to environmental conditions, is likely to be considerably less than its measured physical capacity. The above document states that when determining the environmental capacity of a road *'...local factors, such as frontage activity, conservation area designation and the location of schools and hospital, would also play a part'*.

37. The "Crashmap" data provided with the application does not paint the whole picture with regard to road safety. "Crashmap" gathers its data from the Department for Transport who in turn gathers its data from the Police. Residents of the village will happily attest that not all road accidents in the area are recorded. Many collisions, especially where no other vehicle has been involved, quietly disappear. Freston Crossroads bus shelter has been demolished three times in recent years but does not appear as a statistic. Cars have ploughed into front gardens or trees but disappear before Police arrive or without the accident being recorded as there hasn't been an injury.

38. "Crashmap" include this proviso: *"The records relate only to personal injury accidents on public roads that are reported to the police, and subsequently recorded, using the STATS19 accident reporting form. Information on damage-only accidents, with no human casualties or accidents on private roads or car parks is not included in this data. Very few, if any, fatal accidents do not become known to the police although it is known that a considerable proportion of non-fatal injury accidents are not reported to the police."*

39. Because of the choice of time frame selected by the authors of the Transport Statement, there is no reference to the two fatalities at Freston Crossroads or the "slight" accident near Site 1 where 6 digestate tankers per day will now be entering and exiting onto the B1456 as part of a recent development on G Mayhews Farms Ltd.

Services and facilities

40. There are very few services or facilities in Woolverstone which means that residents have to travel elsewhere for almost everything including shopping, entertainment, school, work and onward travel.

41. The increase in population on the Shotley Peninsula through development that has already been permitted 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.

42. While Chelmondiston Primary School, our nearest state school, has spare capacity the same cannot be said for the local secondary school, Holbrook Academy which has no spare capacity at present. Secondary aged children would have to travel to Ipswich for schooling necessitating further car journeys off the Peninsula. Applications would have no guarantee of places at Holbrook Academy for the foreseeable future.

Cycle paths and footpaths

43. While we welcome the concept of safer cycling along this busy road, it is abundantly clear that the introduction of cycle paths to the proposed housing development on five different sites is to give the impression of sustainability to the application.

44. However, there are only two proposed cycle paths in the application and these are not connected to each other and do not connect with the proposed housing sites. Anyone moving from one to another would need to negotiate 885m of the B1456 with the increasingly heavy traffic load as well as through a "pinch point" where the road is just 5.3 meters in width. And, in some cases, the pavement width is less than a metre. There is no footpath between the proposed Woolverstone to Chelmondiston cycle path and the rest of the village until you reach Glebe Lane.

45. Upgrading the footpaths to bridleways does not form part of the application. While they remain permissive rights of way they do not protect the use of these in perpetuity. As it stands, footpaths will need to be upgraded to bridleways if they are to be used as cycle paths.

46. The inclusion of the Sustrans report, "Woolverstone to Chelmondiston – Route assessment report" as "Transport Statement 7515459" in the suite of documents for the above application is the cause of great confusion because it tries to obfuscate the reality. While we understand that there are two cycle path routes that are part of the application, the "Transport Statement 7515459" describes other routes

which are "aspirational". In truth the two cycle paths do not create a network and hence the need for an additional network. As such, it is clear that "Transport Statement 7515459" is not a material consideration for this application and is a tool for "marketing" and promoting the idea of "sustainability" for the application.

"Sustrans has been asked to produce a feasibility report to look at the options for 'active travel' between Woolverstone, Chelmondiston and Holbrook on the Shotley Peninsula, in Suffolk. Geoffrey Mayhew Farms Ltd., is proposing a development of 22 houses on 5 sites in Woolverstone. The active travel links between the sites and to the nearby local villages, coloured red and green on the following figures can help add to the sustainability and marketing of the developments. They will also improve connectivity for non-motorised users, with benefits for access to local schools, work, services, de-congestion and the wider recreational offer. Wider connections, coloured pink and light blue, can be achieved at a later date, through discussion with neighbouring landowners and Suffolk County Council Highways."

Sustrans: "Woolverstone to Chelmondiston – Route assessment report"

Clearly, the footpaths are expected to add to the sustainability credentials of the application and assist with the marketing of the same.

47. The Sustrans feasibility study should not be considered if it is not part of the application. As an aspiration, we have been told we cannot comment on it because it is not part of the application; however, the document still seeks to add favourable weight to the applicant's proposal. This seems unjust.

48. We have grave concerns over the loss of the footpaths which are to be replaced by cycle paths. The footpath running along the north side of B1456 from Woolverstone to Chelmondiston is a grassy verge that is habitat for voles, shrews and other small animals. These, in turn, provide food for barn owls, kestrels and other raptors. Increasingly efficient farming has reduced the margins and grassland areas. Further loss of this habitat will reduce availability of food for animals and birds alike. We have already found starving barn owls on the roadside.

49. Currently walkers can use the footpaths through the village in relative peace and quiet while enjoying the scenery of the AONB. If

these same footpaths are to double as cycle paths, where they will lose the grass under foot to be replaced by a hard-core surface, and become used by fast moving cyclists there are also concerns about safety.

Collaboration

50. We are concerned by the repeated references to "collaboration" in the "Planning Statement". As such "collaboration" implies a working together towards a common goal. This has not been the case at all. Woolverstone Parish Council has **never** given a view about this application. We have pursued a path of studied neutrality. The Parish Council has remained neutral to the application and has given no view until we saw the full application on 6th August 2020.

51. At our Extraordinary Parish Council meeting on 13th August 2020 we agreed to object to the application.

Design

52. If the Council is minded to grant permission for the planning application, Woolverstone Parish Council would like consideration to be given to the following design features in relation to the specific policies that relate to Woolverstone Conservation Area.

- Brick work prefer Flemish with white mortar and flush joint
- Dormers should be pitched not flat
- Porches should have pitched roof not flat
- Roof tiles should be clay and handmade
- Fenestration should be white timber not powder coated aluminium
- Chimneys should be brick not zinc
- Parapet capping should be stone
- Traditional style front door. The proposed doors too urban.
- Detailing around and below windows.
- Blind windows mimicking window tax properties should be removed
- Cladding is not a feature of buildings within the village apart from cart lodges.
- North facing front doors on Site 3 lead straight into sitting room area offering poor insulation

53. We assume permitted development rights will be removed from all proposed buildings if the planning application is granted.

Conclusion

- Woolverstone must be treated as “*hamlet*” or “*countryside*” not a “*hinterland*” village in terms of all planning policy
- Special regard should be given to preserving and enhancing the character and appearance of the conservation area of Woolverstone and the sensitive landscape surrounding it.
- BDC has a solid five-year housing supply therefore BDC’s saved policies should apply.
- This proposal runs contrary to BDC’s development plan
- There are no exceptional circumstance surrounding this proposal
- There is no proven, justifiable need either within the village or cluster for the type of housing proposed
- The proposed level of affordable housing is too limited
- This proposal is not proportionate to the size of the village at 21% increase
- There would be a loss of the relative safety of pedestrian-only footpaths to shared usage
- The proposals have shown no regard to the cumulative impact of other developments on the Shotley Peninsula which will have a massive impact on the B1456
- The development while nodding to sustainability will in fact be entirely car dependent.
- There are few public benefits to be found in this proposal. Those that there are are outweighed by the harm caused to the heritage assets, the conservation area, the wider historic and sensitive landscapes of Woolverstone.
- That the Government requires more housing to be built should not override BDC’s existing policies.
- Babergh District Council should reject this planning application as it clearly does not accord with its own policies.

Woolverstone Parish Council
10th September 2020