

# Stour and Orwell Society

A society dedicated to preserving and enhancing the environment of the Stour and Orwell AONB and the associated Special Project Area

## BABERGH & MID SUFFOLK JOINT LOCAL PLAN: CONSULTATION DOCUMENT

### RESPONSE OF THE STOUR & ORWELL SOCIETY



**THE STOUR & ORWELL SOCIETY WAS FOUNDED IN 2006 AND HAS OVER 250 MEMBERS WHO CARE FOR THE ENVIRONMENT OF THE STOUR & ORWELL AONB AND THE ADJOINING SPECIAL PROJECT AREA.**

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**Q1. What do you consider the vision should be?**

The Stour & Orwell Society (“SOS”) is wary of compressed vision statements. The vision plainly identifies key priorities of general application. But the success of the plan will be measured in how these are delivered spatially. Babergh District Council (“Babergh”) has to recognise that it has within its local authority area extensive **nationally important environmental assets**, of which it is the current custodian. NPPF (para 115) requires “**great weight**” to be given to conserving landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”. These are irreplaceable national assets and SOS is very keen to ensure that this plan does not leave them compromised. This will be a key element of the legacy of the plan. Babergh has choices to make and we urge that development is located to avoid environmentally sensitive locations, especially where the impacts of new infrastructure to serve any new development will themselves erode key environmental qualities.

We suggest the vision should add: “**Achievement of the vision must not compromise the nationally important environmental assets in the Councils’ care.**”

**Q2 & Q3. Do you agree with the identified objectives? Please explain your reasoning. Are there other objectives which should be added?**

The environmental objectives are too generic. For Babergh, there needs to be a recognition that it is dealing with **nationally** important landscapes AONBs and not just “landscape”. The NPPF singles out AONBs as one of a very limited number of

assets where development should be restricted and the conservation of which should attract “great weight” (paras.14 and 115). Many local authorities have no AONB or National Park and a more generic approach is acceptable. For Babergh, this is not the case.

SOS would like to see express recognition in the “Environment” objectives of the importance of conserving Babergh’s nationally designated Areas of Outstanding Natural Beauty. This would accord with the “great weight” attached to this objective by the NPPF.

***Q4. What should be a priority across the district area?***

See response to Q2 & Q3 above. These comments apply to Babergh district only.

***Q5. What is most important for your town or village?***

For Babergh District, SOS is concerned with the environment of the AONB on the Stour and Orwell Estuaries and the Additional Project Area designated alongside the AONB in the 1970s, which comprises most of the Shotley Peninsula. A large part of this area is also covered by Babergh District’s Dodnash Special Landscape Area. The conservation of this area is a key objective for SOS.

SOS also recognises that limited development in some of the larger villages may be necessary especially to address locally generated affordable housing needs. This is addressed further below.

***Q5 (second one). Do you agree or disagree with the identified key issues for compliance with DTC?***

We agree, in general, but hope that the placing of “Environmental Protection” as Issue No. 9 does not suggest that it is an “also ran”.

***Q6. Are there any other key planning issues which needs to be considered in accordance with the DTC and why?***

Again, given the national priority given to AONBs and the fact that Babergh has extensive nationally designated AONB (including the Shotley Peninsula), running right up to the southern edge of Ipswich, the conservation of this area needs to be expressly identified as a key DTC issue. Mid Suffolk does not have this issue to address.

***Q7. Do you agree with the proposed approach under HR1?***

We agree with the general approach, but fail to see why you are starting from 2014. You are missing a trick here. The period for which you are planning should start from 2016 or 2017. That way, any underperformance in past years has no impact upon the 5 year housing land supply calculation. Put bluntly, you are making an unnecessary rod for your own backs – and for those who have to suffer the impacts of ad hoc planning applications submitted to meet a 5 year housing land supply deficit. Please review as a matter of urgency.

***Q8. What scale of contingency should be applied?***

None. Babergh does not have the luxury of sites with limited environmental impacts and readily available infrastructure to permit it to plan for more than meeting its housing requirement.

***Q9. Are there specific measures that could be included within the joint local plan that could assist with delivery?***

Babergh needs to focus on delivery from its large sites. Progress on these in recent years has been wholly unsatisfactory. It needs a task force to unlock these sites using a “carrot and stick” approach. Too many consented units are going unbuilt in Babergh without satisfactory explanation. The answer is not simply to release more and more land for development. The Local Plan needs to address this issue.

***Q10. What triggers for reserve sites?***

We do not support reserve sites.

***Q11. & Q12. Do you agree with the proposed criteria approach to rank settlements in the hierarchy? If not, please explain a suggested amendment or alternative.***

SOS does not support a rigid formulaic approach to settlement hierarchy. It is necessary to have a working knowledge of these settlements to rank them appropriately and consider their potential to accommodate additional development. We have only considered the settlements on the Shotley Peninsula.

We dispute that Wherstead (south of the A14) can really be regarded as Ipswich Fringe. It is firmly severed from Ipswich by the A14 and swathes of farmland and woodland and has a small village character largely uninfluenced by Ipswich.

We dispute that Chelmondiston can properly be regarded as a Core Village alongside Capel St Mary and Holbrook. It is of a completely different scale and character.

Beyond that, we are concerned that the ranking of the smaller settlements does not give sufficient weight to their potential to accommodate development – especially if the settlement is surrounded by a designated landscape or accessed by wholly inadequate roads.

***Q13. Which option(s) for housing spatial distribution do you think is the best?***

SOS favours **BDH1**, given the desirability of focussing new growth at locations where the majority of services and facilities are located. The Ipswich Fringe and Urban Areas are more readily able to accommodate growth, with access to healthcare, schools, shops and transport hubs.

Substantial growth in the Core and Hinterland villages of 40-55% in BDH2, 40% in BDH3 would be grotesquely unsustainable and will simply perpetuate and magnify unsustainable environmental conditions and increase commuter movements.

Yes, since 2001, **60%** of housing growth has come forward in “rural areas” across the districts. But that is not a statistic to celebrate. It reflects the failure of the Councils to drive forward a sustainable agenda and to direct and deliver development where it is most appropriately located. Rural sites pepper-potted across the districts may be a softer touch and easier to deliver, but we really doubt that it is good long term planning to allow this to reach 60% of supply. Babergh must establish a strong focus based upon its urban development and transport hubs, with a sensible, limited proportion directed to smaller centres as per BDH1.

***Q14. Are there other realistic broad distribution options which should be considered?***

BDH3 has some merit as a concept, but it needs to recognise the severe congestion problems apparent at locations such as the A12/A14 junction at Copdock. It also underplays the role of Ipswich Fringe at 25%, with too much development directed to the villages (40%). A further iteration of this option may be worthy of further consideration with an increased percentage directed to the Ipswich Fringe and a reduced percentage to the Villages.

**Q15. *If there were a new settlement, where would it be located?***

A “new settlement” *per se* is unnecessary and probably undeliverable, given experience elsewhere. It takes decades to establish and build up the identity of such a settlement. Better to build upon an existing settlement, perhaps as a satellite of Ipswich – **if and only if** public transport links were exceptional. It may be possible to consider options in the Claydon area in association with an Ipswich Northern Relief Road or possibly at Copdock/Washbrook **if** links to Ipswich could be established which do not involve the A12/14 junction.

**Q16. *Nationally Described Space Standards?***

Yes.

**Q17. *Self build?***

No objection in principle, but overarching design code is required.

**Q18. *Starter homes?***

Yes, as part of the mix.

**Q19 & Q20. *Type of housing***

We would support a proportionate response to the evidence base: providing smaller houses and homes for the elderly is an increasing concern.

**Q21. *Private rent***

No comment.

**Q22. *Affordable housing***

No objection to 35%, if that is what the evidence establishes as a requirement.

**Q23. *Priority of affordable housing over infrastructure, where viability is an issue?***

SOS does not have strong views on this issue, but we are not sure that housing can or should be provided without adequate infrastructure. We are clear, however, about the existence of an acute need for housing for those who have grown up and want to stay in local areas, but cannot afford to get onto the bottom rung of the housing ladder. The plan must address this.

**Q24. *Key workers?***

Only if there are adequate resources in place to monitor against abuse.

**Q25. *Rural exception sites***

SOS is not expert on this issue, but no more than 25% or thereabouts market housing would seem to guard against abuse of this exception. We also think that Rural Exception Sites should have a maximum size of 6 affordable units.

**Q26. *Which policy approach for rural growth is most appropriate?***

SOS prefers the certainty of established settlement boundaries, especially in an area with nationally designated landscape. We strongly object to any policy approach which appears to invite the intensification of development in rural areas nationally designated for their scenic beauty. Therefore we oppose RG1 and consider that RG2 is a good starting point, but is too vague for the hamlets in much of the area with which SOS is concerned. Why, for example, should any further development be encouraged in the tiny hamlet of Erwarton?

***Q27. Other approaches?***

No comment.

***Q28. Hamlets.***

SOS is genuinely concerned about opening the door to intensification in the hamlets, especially within the AONB. See above. This needs further review.

***Q29-30 Gypsies & Travellers***

SOS does not support the provision of further sites in Babergh.

***Q31-32 Moorings***

SOS does not support the provision of additional moorings. There is already ample provision.

***Q33. Protection of employment land***

Existing protections must continue or the employment land resource will be eroded unacceptably, leading ultimately to a demand for new allocations at some time in the future.

**Q34-37. Existing employment areas etc**

No comment.

**Q38. Level of allocation**

SOS would be wary of allocating more employment land than is forecast to be required, especially as brownfield retail and retail warehouse sites may start to become available as internet shopping reduces the demand for retail floorspace.

**Q39-40. Specific provision and allocation**

No comment.

**Q41. Supporting new business formation**

Small businesses tend to require low cost accommodation. SOS would support reuse of existing farm buildings in rural areas, so long as there is adequate access.

**Q42-49. Retail and commercial issues for centres**

No comment.

**Q50. Protection of A1-A5 in Core Villages**

SOS supports this approach to safeguard key assets in the villages, which are at the heart of their sustainability.

**Q51. BIO1 OR BIO2?**

SOS supports BIO2. We recognise the joined up approach now being taken. Support for SPAs and AONBs through this process is important.

**Q52. Renewable technologies**

SOS very strongly supports option RE2. Renewables developments can disfigure sensitive landscapes. There must be adequate direction given to ensure the avoidance of sensitive valued landscapes, criss-crossed by public rights of way and leisure routes. Such a policy could have avoided the need for a major public inquiry, such as that into the proposed 100 acre Tattlingstone/Alton Water solar farm, which was recommended for approval, but refused by Members and dismissed decisively on appeal. SOS would be happy to discuss the terms of such a criteria based policy with the Council.

***Q53 Water efficiency***

Agreed.

***Q54.***

No comment.

***Q55-56 Landscape protection***

The consultation questions seem to have missed the opportunity to ask this, but SOS strongly supports option L1. Babergh really does have some special landscapes, as the draft plan starts to acknowledge at page 92. These have been documented and designated for many years. For example, the Inspector at the recent Tattlingstone solar farm inquiry found the Dodnash SLA designation useful and valuable. What possible purpose would there be in removing this designation from the plan? It is evidence based and valuable, as has recently been demonstrated. These areas are also extensively used for informal recreation and all parties would want to know that they are valued and protected landscapes. NPPF asks that the planning system should protect and enhance “**valued landscapes**”

(para.109). Surely it is sensible for local plans to identify those landscapes which have for decades been recognised as such – like the Dodnash SLA.

SOS would also advise the protection of those areas in Babergh currently being considered for additional AONB status.

***Q57. Heritage assets***

These are well protected by national policy. Their settings, however, should be carefully safeguarded by the Councils.

Babergh could also include a policy to take action to secure and safeguard a heritage asset which is at risk, such as the magnificent Grade II\* Listed Bentley Hall Barn, which has been allowed to rot for years.

***Q58. Non-designated heritage assets***

SOS supports HA1

***Q59.***

No comment.

***Q60 & Q62. Priorities in design***

Suffolk Design Guide 2000 should be updated to give better protection to settlements where existing character can be better supported. There is still too much disappointing design in new village developments, especially by the volume housebuilders.

***Q63***

No comment.

**Q64. Infrastructure priorities**

For the Shotley Peninsula, this is the ancient country lanes, which are simply not adequate for modern traffic flows. This problem is compounded by the very limited number of options for vehicular traffic driving onto or off the Peninsula. The priority is to avoid further loading on these overused roads and to provide safe cycling and pedestrian options, both for local people and for the many thousands of recreational visitors to the Peninsula.

**Q65-70**

No comment.

**Q70 Open space**

OS2 seems sensible, although we are unsure why 1 ha is a cut off point. Why not 0.5ha?

**Q72**

SOS supports the Council's approach.

**Q73**

SOS supports the Council's preference.

**Q74 Functional Clusters**

SOS is not opposed to this concept, but is not entirely clear how it is to be used. The Clusters in the SOS area are not clear – especially west of Holbrook.

**Q75 Settlement boundaries**

SOS supports BND1 as it will provide certainty.

**Q76**

No comment.

**Q77 Threshold of 10**

SOS supports this, but see comments above regarding hamlets in AONB.

**Q78 Sites being considered for allocation**

We provide responses below in alphabetic order, restricted to the area for which SOS has been constituted:

**Bentley SS0395**

This represents a very significant extension to the village on an absolutely notorious blind bend, where the obstacle to vision (and compliant visibility splays) is an attractive listed cottage surrounded by high hedges. It would cause the village to protrude into attractive open farmland towards Dodnash Woods and is not supported.

**Brantham SS0211**

Developing this site would be very damaging to the setting of the village. The sweep of farmland down to the road is a particularly valued piece of landscape, in daily view to thousands using the A137.

**Chelmondiston SS0872**

This site would protrude randomly into the AONB and is strongly resisted.

NB We doubt that the “extension” to the village envelope – actually disconnected – represents 10 dwellings. As noted above, SOS does not support any presumption in favour of intensification of development within the AONB.

### **Copdock & Washbrook South**

This does not look to be a well-considered development option.

### **Erwarton**

SOS does not support the designation of hamlets within the AONB if this creates any sort of presumption in favour of development.

### **Holbrook SS0201**

SOS strongly opposes this northerly protrusion, surrounded on three sides by open countryside. It would be entirely inappropriate “ribbon development” of the worst sort.

### **Holbrook SS0717**

This site appears to be partly within the AONB – which includes Holbrook Gardens, with its ancient ponds. SOS strongly opposes the development of the AONB.

### **Stutton SS0646**

This site is inappropriate, will place unnecessary pressure on Alton Hall Lane and is poorly suited to meeting housing need.

### **Wherstead Park SS1027**

This site contains the fine listed walled garden of Wherstead Park. It should not be developed.

## **Woolverstone SS0203 & SS0255**

Both these sites are completely inappropriate in landscape and sustainability terms.

Woolverstone has no facilities or shops and is not the place to locate substantial additional development. The site between the two proposed sites would also be extremely vulnerable.

**THE STOUR & ORWELL SOCIETY**

**10.11.2017**