



Waldringfield

Parish Council

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25th June 2019

Re: DC/19/1988/OUT – Land to the North of the A14 and to the West of the A12 Foxhall (Orwell Green Garden Village) – Waldringfield Parish Council Response

Dear Ben Woolnough,

1. Waldringfield Parish Council wishes to express in the strongest terms our concern regarding the limited time period allowed for public consultation on an application of the scale of the above. We are also concerned that as a neighbouring parish we received no notification from the District Council that this application had been validated. This information came to us indirectly via an article in the local press. In these circumstances we concur with the suggestion made by Highways England that determination of this application should be deferred until September at the earliest.

2. Given the very limited time we have not been able to study in detail every one of the 98 multi-paged documents contained within this application. However, from those that we have studied we can identify numerous areas where this application does not comply with Local and National Planning Policies and where statements made within the application are not borne out by facts.

3. For the avoidance of doubt Waldringfield Parish Council objects most strongly to this application.

4. The following is a, not exhaustive, list of the LA Policies that this application violates.

5. This application is entirely contrary to SCDC Local Plan 2013 including the following policies:

- Strategic Policy SP1 – Sustainable Development
- Strategic Policy SP2 – Housing Numbers and Distribution
- Strategic Policy SP10 – A14 & A12
- Strategic Policy SP12 – Climate Change
- Strategic Policy SP14 – Biodiversity and Geodiversity
- SP19 Settlement Policy - Allocations of large scale development to meet strategic needs. General location of such allocations identified in the Core Strategy.
- SP20 – East of Ipswich Plan Area
- SP29 the Countryside – ie. all of the land that sits outside the physical limits boundaries of Major Centres, Market Towns, Key Service Centres and Local Service Centres as set out in the Settlement Hierarchy.

6. This application is entirely contrary to SCDC (as part of the new East Suffolk Council) emerging Local Plan which is now in its final stages. An Inspector has been appointed and the EIP is expected to be completed later this summer.

- SCLP 3.1 – Strategy for Growth in Suffolk Coastal District
- SCLP 3.2 – Settlement Hierarchy
- SCLP 5.3 – Housing Development in the Countryside
- SCLP 10.1 – Biodiversity & Geodiversity
- SCLP10.2 – Visitor Management of European Sites

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- SCLP 10.3 – Environmental Quality
- SCLP 10.5 – Settlement Coalescence
- SCLP 12.18 – Strategy for Communities Surrounding Ipswich

7. Given the total disregard for Suffolk Coastal Policies it is perhaps not surprising that the applicant seeks to discredit the validity of both the Local Plan of 2013 and the almost finalised emerging Local Plan.

8. The applicant seeks to do this by opining, for example in the Executive Summary “xi. However, the Development Plan in place does not plan positively for future development to meet the objectively assessed needs of the District and is time expired. It is therefore considered that policies related to housing supply (SP2, SP29 and DM3) cannot be considered up-to-date and should be afforded reduced weight in the planning balance.

xii It is considered that these are the most important policies for determining this application and consequently, the presumption in favour of sustainable development is engaged.

9. The applicant is similarly dismissive of the emerging Local Plan – see (*Planning & Affordable Housing Statement, §7.4.2*) “Whilst the LPP2 is continuing to progress through phases of consultation and examination, it is considered that it is not at an advanced stage of preparation. There also remain several unresolved objections. It is therefore considered that it cannot be afforded full weight in decision-taking.”

Given that this Plan is shortly to be before the Inspector we would argue that this Plan is at a considerably “advanced stage of preparation”.

10. In addition, specifically in relation to the East of Ipswich Area, the emerging Local Plan shows that the provision of deliverable new houses in the EIA already exceeds the SHLA/OAN residual housing need calculations for this area. SCLP 12.18 confirms that residential developments for this area “*will be limited to the proposal at Brightwell Lakes, land at Humber Doucy Lane to come forward beyond 2031 alongside land in Ipswich Borough, the provision of housing in association with redevelopment of the Police Headquarters site and development within the Settlement Boundaries consisting of infill or small scale redevelopments which make the most appropriate use of previously developed land, plus small allocations or development identified through Neighbourhood Plans.*”

11. The Parish Council has, in a number of briefings and planning meetings with Suffolk Coastal Senior Planning Officers and Members of the Planning Committee received absolute assurances that:

- the District Council can show in excess of 5+ years of deliverable housing land supply and
- the Local Plan 2013 retains its full weight when determining planning applications and that the emerging Local Plan is cumulatively gaining weight as it progresses through its iterative process.

12. We trust that Suffolk Coastal/East Suffolk Planning Officers and Councillors will stand by these reassurances and decide that the policy violations listed above are of themselves sufficient reason to refuse this totally speculative, unwarranted and inappropriate application made by this land promoter. Any other outcome would make a mockery of Strategic Plans and the Planning process.

13. In addition to the above we also wish to make the following comments.

14. We are very concerned that a development of this size, 2,700 houses plus all the associated retail and leisure provision would have an extremely damaging impact on the many protected sites located around this area. Those within the 13km zone of influence include:

- Deben Estuary SPA and Ramsar site
- Stour and Orwell Estuaries SPA and Ramsar site

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- Orfordness-Shingle Street SAC
- Sandlings SPA

15. We say that no amount of on-site green space provision or RAMS contribution could mitigate against such a damaging impact on these internationally recognised sites. Whilst the NPPF supports sustainable development is recognises that development should not be approved if the harm to, for example such special sites outweighs any developer perceived benefit. The first principle of the EU Habitats Directive is avoid harm.

16. Agriculture plays an important role in the economy of Suffolk Coastal, with employment in the sector being nearly 5 times the national average. The applicant accepts that this application is entirely on Greenfield, agricultural land, there are mature woodland areas containing several veteran oaks.

17. *The applicant states in the Environment Statement Non-technical Summary, §1.9.4*

"It is judged that, at the outset on the completion of the Proposed Development, there would be a high magnitude of landscape change on the site, as would be expected for any large-scale development on a greenfield site. The proposal includes a substantial area of GI [Green Infrastructure] and has potential to enhance the recreational opportunities and benefit the Site's biodiversity."

18. This is a gross understatement – there certainly would be "high magnitude of landscape change", mainly from highly productive agricultural land to housing and large scale urbanisation. This is in conflict with the emerging Local Plan §10.26: *"In line with the National Planning Policy Framework the Plan seeks to protect high quality agricultural land where possible. Whilst in some cases meeting wider objectives will necessitate the loss of agricultural land, particularly considering the relatively limited amount of brownfield land available for development in the District, the policy seeks to ensure that loss of agricultural land is a consideration"* similarly the current Local Plan SP1 (e) states - *"...give priority to re-using previously developed land and buildings in and around built-up areas, where possible ahead of Greenfield sites;"*

19. Another significant negative impact is that on traffic.

20. The Traffic Assessment is woefully lacking. It makes no mention of the impact on the Orwell Bridge. Clearly the traffic generated by an additional, unplanned for 2,700 houses will dramatically increase congestion on the A14 and the Orwell Bridge, which is already at full capacity and regularly exceeds it.

21. The proposed new roundabout on the A12 will add yet more delays between the Seven Hills roundabout and Martlesham. If approved drivers will have to negotiate 7 junctions when going from the A14 north on the A12 towards Woodbridge. The Transport Assessment & Travel Plan (TA & TP, §5.3.2) asserts that *"The roundabout would be traffic signal controlled as per the roundabout improvements which are being delivered further north along the A12 corridor by the Brightwell Lakes development. It would therefore create a consistent form of junctions along the A12 and serve to reinforce the future character of the road."*

It would be more accurate to say that the 'future character of the road' will be complete and constant grid-lock!

22. The Transport Assessment & Travel Plan opines in its conclusion (TA & TP, 9.1.14) *"Detailed junction assessments have been undertaken to assess the impacts of development traffic. The analysis demonstrates that the proposed site access provisions (main access via A12 and secondary access points via Bucklesham Road) are entirely acceptable and would operate well within capacity in 2038."*

23. It is almost impossible to trawl through every aspect of the detailed data in the time given to us to respond, but we have not been able to find any evidence to support such a far reaching and ridiculously optimistic conclusion given the current issues regarding capacity of the A12 as of 2019 never mind 2038.

24. The Transport Assessment & Travel Plan (TA & TP, 9.1.16 & §9.1.17) goes on to offer the opinion that *"The*

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residual cumulative traffic impacts of the development are not significant let alone not severe and so the development passes the threshold of acceptability set out in paragraph 109 of the NPPF. It is therefore concluded that there are no transport or highway reasons why the proposed development should not be granted planning consent."

25. This is another of the many examples of unsubstantiated conclusions within this speculative application. Such statements are so without merit that they simply discredit anything else that is to be found in this application.

All we wish to add at this time is to reiterate our most strong objection to this application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Todd', written in a cursive style.

Rebecca Todd, Waldringfield Parish Clerk