

## Comments on the Babergh and Mid Suffolk Joint Local from SAFE ( Supporters Against Fressingfield Expansion.)

### Introduction

SAFE welcomes the opportunity to comment on the Draft Local Plan and appreciate that a considerable amount of work has gone into its production.

This paper makes general observations then addresses the specific questions the District Council has asked be answered.

Our overarching concern is that there is little discussion and emphasis on protecting our rural character and cherishing our historical heritage. The Council has completely underplayed these contrary to the Guidance in the NPPF and National Planning Law.

We understand the pressures on the Council to deliver housing targets, but this should not be at the expense of quality of life for residents and a diminution of our distinct rural heritage which should be safe guarded for future generations.

Inevitably we have concentrated our observations on the implications for Fressingfield.

### Assessed Housing Need and Population Assumptions

We challenge the base assumption that the levels of housing need in the two Districts are high and that addressing this perceived major shortfall can be undertaken through a "Plan Led " approach.

We believe that the delivery of houses should be organic based on **local** need and not a plan centrally dictated which goes against the Localism Act of 2011. Current rates of house building are low because as the **last local plan stated** population here is dropping and local employment opportunities are few. The Local Plan stated the need for houses in the area was low and falling. The current evidence base for population is misleading, the population since 2001 has hardly changed but there is a 10% growth assumption based on total UK migration levels that it has therefore providing false information that 430 houses are needed in the District the new evidence base is flawed and the Draft Plan is not aligned to realities of local need and population. The paradox will be that it will become harder or impossible for local people to buy into affordable housing if migration is encouraged from other areas to bolster development here for the unrealistic economic policy of the District Council in this Plan.

It is of great concern that the Draft Plan proposes including high levels of "flexibility " in determining where housing is located. If one part of the Housing Market Area (HMA) fails to meet its targets for new houses then any other part of the HMA can be called upon to make up any shortfall. Our " Area " includes Suffolk Coastal and Ipswich. This proposed "flexibility" gives the Council the powers to put housing more or less wherever they choose across Suffolk. This gives the Council far too much leeway in this matter

### Population Centres

The main driver of the document is growth both in terms of the economy and housing. How do small villages like Fressingfield fit into this? Across Babergh and Mid Suffolk more than half the population live in villages and rural areas. The Current Local Plan

recommended that **70%** of new housing be in urban areas while **30%** in Rural settings. Since 2001 approximately **60%** of new housing was in rural areas at complete odds with the agreed Plan. The draft Plan recommends that urban areas account for 60% of new builds. **There is no discussion as to how this target will be monitored and enforced in the light of the previous missed target.** This is worrying as whilst it is clearly stated that "sustainable development is at the heart of Planning" more pressure on rural communities with limited infrastructure will result in less sustainable development. In Fressingfield there are locally 58 whole time equivalent jobs. The lack of employment has major implications for a sustainable community.

It is disappointing that there is little discussion about protecting our rural character and cherishing our historical heritage.

The "settlement Policy " contained within the Current 1998 Plan stresses the need to develop along the A14 corridor and confirmed a strategy of minimising pressure on small towns and villages with the view to reducing travel and servicing costs. " in particular, new housing developments should be sympathetic in scale and character to the existing form and pattern in the Plan area. Most larger scale developments in the form of estates will be directed to the towns. In villages, most housing will be in the form of small groups of dwellings or infilling of small undeveloped plots. Housing for general needs should not take place in the countryside." It is extremely unfortunate that this worthy aspiration is not included in the Draft Plan.

### **Economic base**

The Draft Plan identifies growth in Babergh and Mid Suffolk in tourism; creative industries; food production; construction and related services; hospitality/ leisure. There is no mention on rural businesses and farming - this is a rural area with farming as one of the key activities.

### **Landscape**

Babergh is mentioned above Mid Suffolk District in terms of being part of an area of outstanding beauty. Mid Suffolk's landscape is of no less value. Objectives of the plan must include to safeguard quality of life. Many people choose to come or remain in this area despite lack of income/job opportunities for the rural quality of life here which should be protected.

It is **very disappointing** that the use of "brownfield" sites is not prioritised for development before virgin sites are considered. This would seem a major failure of the Draft Plan. Indeed the Sustainability Assessment Report is headed " Housing Targets for Greenfield Sites". There is no mention of using brownfield sites. This clearly is a priority in National Planning Guidance and should be reinforced in this document.

One of the housing partners of housing development is Greater London Authority. Why? unless there is an assumed outflow of people from London to Suffolk.

More should be mentioned in this section on saving the rural character of the district.

## **Biodiversity**

The plan talks about only safeguarding natural habitats in Special Protection areas and Special Areas of Conservation!! These are tiny pockets within the open countryside in the District and as national planning policy advises, their habitats should be protected by making sure they are connected and undisturbed by development.

The same protection for Landscape is only given to areas of designation in the local plan which is again selective and wrong. We would argue that protection should be given to areas of rural landscape. Economic policy is wrongly put at the top of the agenda in the Draft Local Plan at the cost of our own unique rural county.

## **Overarching Objective**

Local plans - under the localism act of 2011 if communities are to be allocated power to shape their village or town, they must be allowed to not only bring forward allocations of land for development, but be able to **limit development** if not appropriate or needed. Here the District Council are misleading communities by limiting the true role of Neighbourhood Plans. This is not true democracy. Communities must retain the right to limit development.

Fressingfield is a unique village with 58 listed buildings and a major important Conservation area. The village is framed by rolling arable land and trees. There does not appear much evidence in the Draft Plan to support the protection of unique environments such as ours.

## **Draft Local Plan - Response to Questions**

Question 1 The vision should also include " To protect our precious environment and providing sustainable development based on **local** need."

Question 2 Agree with the objectives in principle, but more emphasis should be placed on conserving our rural assets. The vision must be realistic, achievable and in line with the NPPF.

Question 3 Under " environment" - housing should be **prohibited** in areas of flood risk. Also add in the Neighbourhood Plans should be binding being reflective of local communities wishes.

Question 4 The Eye District area should be developed to ensure that housing developments relate to local accessible employment.

Question 5 Fressingfield has only 350 houses in the central area of the village. We need to be sure that further development is sustainable and proportionate to the community and its 58 Listed Buildings.

Question 5A The duty to co-operate with Local Communities is a statutory requirement under the Localism Act. Under the present arrangements Neighbourhood Plans are not given appropriate weight and communities wishes are ignored. It is not appropriate that a key DtC partner is the Greater London Authority.

Question 6 No comment.

Question 7. We do not agree with the overall targets. We are unclear HR1 as to the base line used. Table 19 of the Sustainability Assessment does not include 9 years of "windfall houses" The 2 years that are recorded show 240 and 246 pa being built. The inclusion of 9 years of unrecorded windfall builds result in an additional 2160 having been built. We are unclear as to whether these 2160 houses have been factored into the calculations.

It is difficult to comment on the OAN as there is no discussion on the Peter Brett Paper. The Peter Brett Paper does have a lot of caveats and these are not exposed.

Question 8 As we believe that the target is too high we do not need a contingency, particularly as wind fall houses( which are not factored in will provide a natural contingency.

Question 9 No comment

Question 10 If significant local employment opportunities arose, then additional local housing on reserved sites should be considered.

Question 11 Agree that the criteria are fair and sensible approach, but a link to existing populations and local need could have resulted in a more balanced approach.

Question 12 The designation of Fressingfield as a " Core Village " objectively is not correct. ( see below )

### **Fressingfield's Hierarchy Status in the Draft Local Plan**

Fressingfield was previously identified as a "Primary Village" having infrastructure capable of sustaining limited development of about 50 houses over a ten year period. BMSDC in the Draft Local Plan have designated Fressingfield as a " Core Village" capable of sustaining greater levels of development than would have been assumed for a "Primary Village."

Within the Draft Local Plan there are 2 important supporting documents " BMSDC Services Facilities Audit - August 2017" and "BMSDC Topic Paper: Settlement Hierarchy Review- August 2017." These documents very logically allocate a score to each village based on facilities available. Unfortunately in respect of Fressingfield some services identified do not exist. This results in Fressingfield **being incorrectly** designated as a " Core Village." Below is an analysis of the criteria, the "points" allocated and an explanation as to what is available.

<b>Criteria</b>	<b>BMSDC Score</b>	<b>Our score</b>	<b>Comment</b>
Convenience store	2	2	Agreed
Post Office	0	0	Agreed
Restaurant/public house	2	2	Agreed
Butcher/Baker/fuel/hairdresser ATM/newsagent	3	0	We do not have any of these
Pre School	1	1	Agreed
Primary school	2	2	Agreed
Secondary Education	0	0	Agreed
Local Employment	0	0	Agreed
Village Hall	1	1	Agreed
Place of Worship	1	1	Agreed

Library	0	0	Agreed
Doctors' Surgery	2	2	Agreed
Chemist/Pharmacy	2	0	The dispensing practice does not provide the services of a retail chemist.
Dentist/Optician	0	0	Agreed
Bus Service	2	0	We have one bus per week.
Railway Station	0	0	Agreed
Allotments	0	0	Agreed
Recreation Ground	1	1	Agreed
Sports Centre/leisure centre	1	0	We do not have a sports centre as described.
Broadband speed	2	1	Only part of the village can access superfast broad band
Proximity to town	0	0	Agreed
Proximity to key centre	0	0	Agreed

When the corrections are made Fressingfield scores 13, not 23 in respect of facilities available. Fressingfield should be classed as a " hinterland village" (18 and above being a core village).

Question 13 Option MHD1 is our preferred option being in line with our stated objectives to preserve the quality of the rural environment whilst accepting the need for sustainable growth. This is particularly relevant when one looks at the pattern of development during the period of the Current Plan when 60% of houses were built in rural locations.

Question 14 Distribution to be targeted at transport links.

Question 15 Do not agree that a new settlement is needed, but if there was to be one we would advocate that it be developed near good road rail links to facilitate sustainable transport as presumably this would be a dormitory town.

Question 16 Yes. Houses have become too small. People need space to be healthy physically and mentally.

Question 17 Seems sensible, especially if they are eco- friendly.

Question 18 Would not Council homes for rent be a more sustainable option and a better use of public funds?

Question 19 No, need a good mix of housing.

Question 20 No

Question 21 This suggestion sounds completely impossible to deliver.

Question 22 In the Fressingfield area the Affordable Housing target is too high. There are currently 11 families on the waiting list for affordable homes in Fressingfield. All can be accommodated within the housing developments approved but not yet built. To build more would result in people with no connection with Fressingfield living in a village with no

employment to speak of, **one** public bus per week and limited social life. The target needs to be realistic and reflect local need. Say 5% as more locals apply to be on the list.

Question 23 We are not sure what this question means. Viability should always take precedence.

Question 24 We believe that key workers should have priority, but **near** to their employment.

Question 25 Seems sensible, say up to 80%

Question 26 RG1

Question 27 There should be an organic approach rather than a Plan based approach.

Question 28 Policy HG2 seems a practical and sensible approach to give people with local connections to move to a small village.

Question 29 No Comment

Question 30 No Comment

Question 31 We believe that mooring sites should be identified.

Question 32 This cannot be answered as a proper survey would be needed.

Question 33/35 The answer to this depends on individual circumstances. For example if the current chicken factory closed then housing on the site would be appropriate as Webread has narrow roads and is not a good village in which to locate a major factory. In summary, the answer to these three questions does depend on each case.

Question 36/ 39 No Comment

Question 40 The Eye Industrial estate.

Question 41 reduce Business rates to encourage start ups.

Question 42 This is very difficult to answer and depends on individual sites. In Framlingham there have been major housing developments without additional parking in the town centre. Less people now shop in Framlingham because of the parking problems. These developments have negatively impacted on the local economy, so in Framlingham retail and parking probably should have been included in the call for sites.

Question 43 and 44 No comment

Question 45/49 Yes to all questions

Question 50 No Comment.

Question 51 There is no discussion on general open countryside and the protection of distinct local landscapes outside the narrow designations. Would recommend that BIO2 is supported subject to the above.

Question 52 Importance has to be placed upon the landscape and more done to protect it in relation to wind farms and solar panel fields.

Question 53 Agreed

Question 54 In the current Local Plan more weight is given to the environmental standards in the current draft Plan these are played down by the call for development. This issue deserves a major section within the Local Plan as has been evidenced in previous Local Plans.

Question 55 Concentrate development that is appropriate in scale and concentrated on urban areas to preserve the rural and open character of the countryside.

Question 56 Yes- most definitely.

Question 57 By protecting, not just the listed assets, but also their setting which is in line with the old National Policy Guideline PG 22.

Question 58 Equal protection is needed to preserve open countryside, only protecting designated sites is too narrow a policy that leaves other areas vulnerable to over development. A new paper should be commissioned on the current heritage assets in the Local Authority area.

Question 59 Yes

Question 60/61 Minimum space standards should be applied and design be sympathetic to vernacular buildings.

Question 62 Most certainly "yes". The overdevelopment and cramming of houses in Framlingham should give lessons that this should not be repeated. Frequently Framlingham is referred to as having been "ruined" by local residents.

Question 63 Support INF 2 as far more account needs to be taken of infrastructure requirements

Question 64 In Fressingfield we suffer from floods; raw sewage on the highways and in gardens; poor roads; few footpaths; poor transport links; one bus a week; high accident rates. With possible developments in the pipeline our surgery and school will be oversubscribed.

Question 65 all of the above are a priority and seriously need to be considered in the light of sustainable development.

Question 66 As a minimum work to the sewers, school and health centre. **BUT** little can be done to improve the roads and footpaths as these directly abut houses in the conservation area. The flooding issue will get worse with an increase of hard landscaping and the drainage of the sites into the Beck.

Question 67 A sensible approach

Question 68 Yes

Question 69 Yes

Question 70 Overdevelopment could contribute to deprivation with reduced quality of life and longevity. Therefore over development should be avoided.

Question 71 Open spaces should be protected, not only Local Green Space.

Question 72 Yes- Can Neighbourhood Plans designate their own green spaces.

Question 73 Should include village greens and community woodlands.

Dr. John Castro - Chairman of SAFE. Signed on behalf of all SAFE members.