

Capel St Mary

Clerk: Mrs Julie Lawes

Tel Fax: 01473 314103

e mail: capel.pariahclerk@btinternet.com



Parish Council

Chairman: Mrs Christine Matthews

Tel: 01473 310190

web site: capelstmary.onesuffolk.net

27a The Street, Capel St Mary, Ipswich IP9 2EE

Babergh District Council
Planning Department
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Tuesday 6th February 2018

DC/17/06318 - Persimmon Homes Development 7, Little Tufts and Land East of Longfield Road, Capel St Mary

Dear Sir or Madam

Following an Extraordinary Meeting on 5th February 2018 the Capel St Mary Parish Council recommends **REFUSAL** of this application.

INTRODUCTION: Application for outline planning permission for a residential development for up to 100 no. dwellings with highway access off Little Tufts. This application follows a previous application for the erection of 150 homes on this site (B/16/01458) which was refused by unanimous vote of the Planning Committee after a site visit. Following an Extraordinary Meeting on 5th February 2018, and extensive consultation with residents, Capel St. Mary Parish Council recommends **REFUSAL** of this application for outline planning permission, as little has been done to address the many issues previously raised. The principal reasons for this decision are as follows and where appropriate we have highlighted in bold relevant sections of **Babergh Local Plan 2011-2031**.

LOCATION. The Babergh District Council Strategic Housing Land Allocation (SHLA) identifies several sites around Capel St. Mary which are currently being considered for development. Planning consent was recently granted for a development of 97 homes by Hopkins Homes at Days Road (B/17/00122). In our view it is not helpful to consider these potential developments on a piecemeal basis, a view supported by a consultee for this application, Suffolk County Council, who state that –

'the County Council would like to see a plan-led approach to housing growth in the Capel St Mary locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including highway impacts and school provision.'

Rural Housing and Core Strategy Policy CS11 Supplementary Planning Document July 2014 Para. 11 states that *'The cumulative impact (of developments) should include existing commitments and other proposals in the same village and existing commitments and other proposals in the cluster where they are likely to have a wider impact for example in terms of*

traffic generation capacity of schools and health services'. There is a real need for a strategic overview of how Capel is to be developed, in accordance with **Policy CS15 Implementing Sustainable Development in Babergh Para iv**).

INFRASTRUCTURE. The Parish Council had envisaged a fair share of 1050 homes along with other Core and Hinterland villages (**Babergh Local Plan 2011-2031 CS3 Strategy for Growth and Development**). Whilst we accept that we must bear a proportionate amount of new housing the developments planned, if approved, would be disproportionate. **Rural Housing and Core Strategy Policy CS11 Supplementary Planning Document July 2014 Para. 12** states that *'A key part of CS11 is that proposal should meet locally identified need'*. In April 2016 Capel St Mary Parish Council completed a Housing Needs Survey in conjunction with Babergh District Council Planning Dept. the conclusion of which was that Capel needed about 100 new homes. Other development proposals, including this one, could total some 650 homes or more and if the cumulative impact of developments in local villages e.g. East Bergholt are taken into account the situation is far worse. Persimmon Homes have to date failed to provide the Housing Needs data that they refer to in their submission.

Rural Housing and Core Strategy Policy CS11 Para. 10 states that *'Proposals for both core and hinterland villages will need to demonstrate that the development can be accommodated without adversely affecting the character of the village and that the services, facilities and infrastructure have the capacity to accommodate it or will be enhanced to accommodate it. Where enhancements to facilities and services are required the impact that this will have on the viability of the proposal will be taken into account'*. The scale of development currently envisaged contravenes this in that the character of the village will be adversely affected, and a range of local services will be unable to cope. Here again Suffolk County Council, state that –

Schools: *'Based on existing forecasts SCC will have no surplus places available at the catchment schools to accommodate any of the pupils arising from this proposed scheme'*.

Library: Existing facilities are inadequate and *'A minimum standard of 30 square metres of new library space per 1,000 populations is required'*.

Regarding the **Doctors' Surgery**, Consultee NHS England state that *'There is 1 branch surgery within a 2km radius of the proposed development, Capel St Mary surgery (including its main Constable Country Rural Medical Practice). This GP practice does not have sufficient capacity for the additional growth resulting from this development and known cumulative development growth in the area'*. In fact, the main Constable Country Rural Medical Practice is 4.8 kilometres from the village centre.

Provision of CIL funding at the levels requested by consultees will not address these problems. The library cannot expand, neither can the local schools. The medical practice cannot expand the local surgery and any CIL funding granted will be *'to increase capacity within the GP Catchment Area'* i.e. East Bergholt. Increasingly our residents would have to make this dangerous journey by car via the A12.

The A12 Northbound is already congested and dangerous, and routinely backs up to Capel St. Mary from the Copdock interchange with the A14. Many junctions along this road are dangerous and sub-standard. Extra traffic flow will exacerbate this problem.

PUBLIC CONSULTATION

Rural Housing and Core Strategy Policy CS11 Supplementary Planning Document July 2014 Para. 18 states that *'The Council will require developers and landowners to carry out local consultation on their proposals before an application is submitted. In this respect*

developers and site promoters should engage with local communities before proposals are formulated in any detail using recognised community engagement techniques'. There has been no public consultation regarding these proposals. Consultations for the previous proposal were totally inadequate, in fact a complete shambles.

SUITABILITY OF SITE

Summary of Sites 2011: The Parish Council do not consider this site to be suitable for development. It should be noted that in 2011 Babergh District Council's *Summary of Sites for Development* stated, after detailed analysis, that the site was not suitable for residential development because '*Suffolk County Council identified significant access constraints The site is not considered potentially suitable for residential development as a result of access constraints The site is not included (in yield calculations) as the site is not considered potentially suitable for residential development.* Since 2011 nothing has changed and in fact the situation has deteriorated due to the increasing use of cars since that time.

Site Access: The proposed two-way access to this site is via an existing Close, Little Tufts. It is totally unacceptable for a small cul-de-sac to be opened to the number of vehicle movements anticipated from a 100 homes development. Use of this Close for access would cause considerable parking and access problems for local residents. Planned improvements would have little effect as neither the road nor its pavements can be widened to meet current standards. The junction of Little Tufts with Longfield Road is very close to the junction of Longfield Road with Thorney Road (a bus route through the village). This area is unable to deal with the likely traffic congestion and create dangerous traffic build up. The road near the junction has itself been the subject of investigations by Highways Department due to parking problems caused by the local dental surgery. Little attempt seems to have been made by Persimmon Homes to investigate or develop alternative access to this development. An existing farm track and public footpath (Butchers Lane) have been suggested as providing emergency access, possibly with locking posts to prevent public access. This too is totally unacceptable.

Agricultural Access: Consultee Canon Consulting Engineers state that '*Agricultural access can be maintained from Butchers Lane, through the site to the surrounding agricultural land*'. It is in our view totally unacceptable, and we believe impossible, to allow large agricultural machinery to pass through Butchers Lane, an existing PROW that will provide greater pedestrian access should this development go ahead. The Grade 2 Agricultural land that remains, not forming part of this proposed development, will cease to be viable. It is clear from the plans that the two roads that end at gated exits are likely to be extended into the fields to form Phase 2 of this development at a later stage, creating even more access and traffic flow problems. Persimmon Homes have not denied this possibility.

Surface Water Flooding: Capel St. Mary Parish Council shares the concerns both of local residents and Suffolk County Council Flood and Water Management Planning Dept. about the risk of flooding posed by inadequate proposed measures and that the applicant needs to do more to demonstrate how they have arrived at their proposed solutions.

SUMMARY: In conclusion Capel St. Mary Parish Council recommends **REFUSAL** of this application for outline planning permission, as the site and access arrangements are totally unsuitable. The proposed development does not in our view fully comply with various requirements set out in **Babergh Local Plan 2011-2031** and **Supplementary Planning Document July 2014**.

Yours sincerely

C. Matthews

Mrs Christine Matthews
Chair of the Chapel St Mary Parish Council