

The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and Local Government
House of Commons
London
SW1A 0AA

31/01/2020

By email and post

Dear Secretary of State

DC/19/02312 - outline planning application for 49 houses on south side of Framlingham Road

I should like to request, on behalf of Laxfield Parish Council, that you exercise your powers as Secretary of State to call in the decision on the above planning application on the grounds that it:

- may conflict with national policies on important matters
- may have significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority

We make this request on the grounds that we believe:

- the Local Planning Authority (LPA) is not taking into account the overarching requirements of the UK Sustainable Development Strategy in determining whether the application represents sustainable development (for example, in disregarding the requirement that growth must be sustainable growth, not simply growth for its own sake)
- the LPA is disregarding the views and needs of the local community in being minded to grant permission for a development which will fundamentally alter the character and sense of place of the village, and damage the identity of the existing community and the place in which we live
- that it is disregarding the cumulative impact of development on a small rural village

This is nationally significant in that there is no evidence that LPAs are taking any strategic overview of the cumulative impact of development on a particular location. There is, however, clear evidence of the same pattern of disregarding the impact of development on the character and sense of place of vulnerable and often fragile rural communities in other locations across the UK.

I attach a copy of the Parish Council's objections to the proposal (as originally submitted for a development of 65 housing units, and as amended to the current application for 49 units) to help set this request in context.

Yours sincerely



Sue Innes
Chair, Laxfield Parish Council

Dear Sirs,

Objection to DC/19/02312 - outline planning application for 65 houses on south side of Framlingham Road

Laxfield Parish Council wishes to express its strong objection to the proposed development at Framlingham Road, Laxfield.

We believe that the development proposed is contrary to the policies set out within the Mid Suffolk Core Strategy Development Plan (adopted 2008) and in the emerging Joint Local Plan. The applicant makes reference to the provisions of paragraph 49 of the National Planning Policy Framework (NPPF), which provides that applications for housing should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. As Mid Suffolk District Council has published a Housing Land Supply Position Statement in March 2019 which concludes that the requirement of the NPPF are currently met, this argument has no validity.

Furthermore, this development cannot be considered to represent sustainable development. The Planning Statement sets out the degree to which it is considered to meet economic, social and environmental objectives, but these do not adequately consider the context of this development and reflect the reality of its location. To respond to these observations (*extracts from the Planning Statement in italics*):

8.2.3 The construction phase will stimulate the local economy through the employment of construction workers/professionals and the sourcing of building materials. The applicant has no control over the employment of those working on the development, nor on the sourcing of materials: the intention is that the site will be sold to a developer if planning permission is granted. There is no provision within the application to require sourcing of local materials nor local employment and this is therefore an entirely specious argument. *Secondly, future occupiers of the development will utilise local services and facilities, including those within Laxfield, supporting the local economy.* Most of the services and facilities within Laxfield are thriving without the additional pressure of a large development taking place at a single stroke; they would be much better able to cope with a number of smaller developments which would be more appropriate to the scale of the village. Some of the services in the surrounding area which would be essential for a development of this size are already at capacity or beyond: the doctors' surgeries in Fressingfield, Framlingham and Halesworth, for example.

8.2.8 The development in this instance provides of up to 65 dwellings, including 35% affordable housing, and whilst the size and mix of the units is yet to be agreed, the proposal will provide a range of properties to cater for the needs of the community. The indicative layout for the development suggests that a significant number of four- and five-bedroom houses is likely to be included in a full application, along with a few two-bedroom and just under 50% three-bedroom houses. This is not a range of housing that would meet local needs: Laxfield already has an over-supply of larger houses, and the predominant need is for truly low-cost – rather than 'affordable' – and self-build housing, along with sheltered housing and smaller units (as indicated in the research carried out for the emerging Neighbourhood Plan).

This research found that there was no appetite amongst the residents of the Parish for large-scale development outside the settlement boundary: 97% of residents favoured a number of small developments as being the best way to meet local housing needs. The primary needs identified are for sheltered accommodation; self-build housing; smaller (2-3 bedroom) housing units; and starter homes. Great concern was expressed about affordability and the fact that many local people cannot afford to enter the housing market.

Furthermore, there was almost no support from residents for development at a rate of more than 20 houses/year – almost all respondents strongly supported development of no more than 10 units/year over the Neighbourhood Plan period, ie to 2036.

Both the rate of development and the overall size of this proposal are entirely disproportionate to the immediate context: this development alone represents almost 15% of the current number of housing units in the Parish as a whole, and it is therefore completely out of keeping with the scale of the existing village and surroundings. The site was allocated in the 2017 Strategic Housing Land Availability Assessment for no more than 25 housing units on only part of the total site area, specifically in order to reduce the impact on the village of developing this site.

Although the Neighbourhood Plan is not yet 'made', the NPPF (in paragraph 29) specifically states that neighbourhood planning gives communities the power to develop a shared vision for their area, and (in paragraph 48) - allows for local authorities to give weight to emerging plans and we would therefore strongly urge Mid Suffolk District Council to take the findings of the Neighbourhood Plan research into account in reaching a decision regarding the appropriateness of the proposed development in this particular location. The NPPF states in paragraph 77 that planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. That the development proposed might be considered appropriate in some circumstances is not disputed: but we firmly believe that it is not appropriate for Laxfield; it is not responsive to the circumstances of the village or the Parish, and it does not reflect local needs.

8.2.9 – 8.3.3 Provision of a School car park These paragraphs refer to the proposed provision of 17 school car parking spaces, and 17 drop-off parking spaces within the development. Whilst it is acknowledged that the school and pre-school (which are co-located) would need additional accommodation provision to satisfy the need for places resulting from the proposed development, we understand that this school – in common with most others across Mid Suffolk – is currently at capacity but predicts a falling roll over the next few years. It is therefore arguable that the space released within the current school grounds for expansion would be sustainable in the medium to longer term. In addition, we firmly believe that the negative impacts of the proposed development would far outweigh the benefit offered by the parking and drop-off spaces indicated. In terms of safety, for example, the parking spaces are located across the road from the school and there is therefore an immediate hazard unless supervision is provided for pupils crossing the road (with substantially increased traffic levels from the new development). The Parish Council recognises the importance of supporting the school and pre-school, including the need for improved parking arrangements, but we believe that such arrangements could be made in better ways than as part of the proposed development.

8.3.4 – 8.4 The bus services referred to in the Planning Statement are not adequate to be considered an effective alternative to car transport: the service which operates between Laxfield and Framlingham and then on to Ipswich, for example, operates once a day in each direction during the week. Train and bus services connecting from local provision to further afield are not sufficiently accessible to allow reliable travel to work or study opportunities. The argument that "*there are opportunities to access public transport*" therefore does not give an accurate picture of how realistic an option this really is. The development as proposed also clearly intends to be almost wholly reliant on transport by car, as the extent of provision of parking and garaging in the indicative layout clearly shows. The Planning Statement also makes no reference to options such as electric car charging or car sharing. Although there is reference to creating and extending the footpath network within the village, in reality this refer to creating a short length of footpath across land which is not in the applicant's ownership, which therefore may not be a viable part of the development. There is

no potential to integrate this proposed development into the layout of the village: it is essentially separate because it sits outside the existing settlement boundary.

Environmental sustainability is not addressed in terms of design and layout of the proposed development (apart from the provision of an attenuation pond) with no reference to sustainable design and construction principles or techniques – or indeed anything other than public transport services. We would argue that any housing development cannot be considered environmentally sustainable unless sustainable design and construction is a fundamental requirement. The availability (or otherwise) of public transport is a very small component of environmentally sustainable housing.

Transport is, however, extremely important in terms of the proposed development for very different reasons. The single access to the site is located directly opposite the primary school on an already-busy C class road which is in very poor repair, with blind bends and narrow passing places. This road – and particularly the part adjacent to the proposed development site - is notorious locally for a number of accidents which have occurred at the blind bends just outside the existing settlement boundary. These were, thankfully, not serious enough to be reported to the police, but are still evidence that the road is unsuitable for the additional traffic which would be generated by the proposed development. In addition, the junctions at either end of Framlingham Road – with the High Street at the Laxfield end, and with the B1116 at the other – have no potential for alteration to cope with the additional traffic levels and we would therefore suggest that the applicant should (if the application is successful) be required to prove that the extra vehicle movements during and post-construction can be safely managed at these points.

The Transport Assessment provided as part of the documentation supporting this application states that the impact on local roads will be minimal. However, we believe that this assessment does not truly reflect the nature of the roads and the traffic in the specific context of Laxfield: the impact of the additional car movements might well be very small in the context of an urban environment, but in such a rural environment it would be extremely detrimental and represent a significant extra risk to both pedestrians and other road users.

In conclusion, we would add that the Parish Council is not opposed to new development in Laxfield in principle, and would actively support development which is appropriate to the expressed views and needs of local residents. We believe that there are other, far more appropriate options available: the Neighbourhood Plan group is actively developing proposals to support these views and needs (for example, through the establishment of a Community Housing Trust) at a rate and scale which is consistent with the rural nature of the Parish. We therefore firmly believe that Mid Suffolk District Council should refuse permission for the develop

Dear Sirs,

Objection to DC/19/02312 - outline planning application for 49 houses on south side of Framlingham Road

Laxfield Parish Council notes that the proposal previously submitted has been amended to reduce the number of homes provided to 49 instead of 65. However, we believe that the fundamental principles of our previous objection still stand and we therefore wish to express our strong objection once again to the proposed development.

We believe the amended proposal is still entirely contrary to the policies set out within the Mid Suffolk Core Strategy Development Plan (adopted 2008) and in the emerging Joint Local Plan. To reiterate and emphasise some of the points made in our previous objection:

- The National Planning Policy Framework (NPPF) provides that applications for housing should be considered in the context of the presumption in favour of sustainable development. Laxfield has been identified in the emerging Local Plan as a hinterland settlement, which means that there are more sustainable locations for development within the District. The village is suffering from a reduction in the level of infrastructure and services it used to have: there is, for example, now no doctor's surgery and the regular bus service to Halesworth was terminated at the end of October.
- Laxfield has already delivered almost all of the housing contribution identified as appropriate in the emerging Local Plan, and over a very short timescale: 63 of the 65 housing units identified over the Plan period have already been granted planning permission (as shown in Appendix 1). The cumulative impact of this proposal in addition to the recent permissions for new development would be substantial and extremely damaging to the existing community, which is already suffering from the loss of services, and it would be a clear contravention of the presumption in favour of sustainable development to allow it to proceed.

PLEASE NOTE: Since this letter was originally written, another planning application has been granted for a single housing unit. Appendix 1 has been updated to reflect this. Furthermore, an application for 11 housing units, as a second phase of an existing development, is currently awaiting a decision. We have every reason to believe that this application is very likely to be granted.

- The scale of the proposed development is entirely disproportionate to a rural location: it still represents some 10% of Laxfield's existing housing stock even despite the reduction in numbers in the revised scheme. We believe that this development is more suited to an urban location where the comparative impact would be much smaller.
- The proposed site is at the edge of the village, leading into open countryside. Although the indicative design shown in the submission includes open space at the edge of the development, this cannot offset the visual impact of a large-scale development in such a rural location. The site is currently good agricultural land and is cultivated as such, and we see no need for its use to be changed for this particular purpose.
- The existing highways networks around the area are inadequate to cope with a development of this size: Framlingham Road itself is a minor road which is single-track in places and is in very poor repair. There is substantial local concern about the safety of locating the entrance to the site immediately opposite the school where there are already issues associated with

traffic at the beginning and end of the school day. This will only be exacerbated by the addition of a further 49 homes in such close proximity.

- The proposal includes an indicative masterplan for the site but the application is currently for access only with all other matters reserved. This means that the indicative scheme shown could very easily be changed in the future, and that it is not possible for the proposal to be assessed fully at this stage. We feel that this is not acceptable for a scheme which would have such a significant impact on the local environment if it were to be permitted. If the District Council were minded to consider the application further, we would request that a detailed planning submission be required so that all parties can assess the information appropriately.

We reiterate that we firmly believe that Mid Suffolk District Council should refuse permission for the development as proposed.

APPENDIX 1 (updated): Planning permissions which contribute to Laxfield's assessed contribution of 65 homes over the period to 2036

| Planning Permission Reference | Site Address | Date of approval | Net dwellings outstanding 2018 | Net dwellings outstanding 2019 |
|--------------------------------------|---|-------------------------|---------------------------------------|---------------------------------------|
| M /3610/12/FUL | Co-operative Food Store, High Street | 15/01/2013 | 1 | |
| M /3844/12/FUL | Belle View, Cake Street | 04/04/2013 | 1 | |
| M /1683/13/FUL | The Old Boys School, Market Street | 29/08/2013 | 1 | |
| M /3064/13/FUL | 2 Framlingham Road | 03/12/2013 | 1 | |
| M /2326/14/FUL | Brick barn at Corner Farm, Banyards Green | 03/06/2015 | 1 | |
| M /1683/15/FUL | Land rear of St. Helens, High Street | 23/07/2015 | 1 | |
| M /1073/16/FUL | Fishers Farm, Dennington Rd | 11/05/2016 | 1 | |
| M /3500/16/PRN | Corner Farm, Banyards Green | 12/10/2016 | 2 | |
| M /3642/16/OUT | Land on west side of Bickers Hill Road | 11/04/2017 | 10 | |
| DC/17/03501/FUL | The Villa High Street | 12/09/2017 | 1 | |
| DC/17/04032/FUL | Land to rear of Underlimes and St. Helens, High Street | 06/10/2017 | 1 | |
| DC/17/04774/PRN | Chestnut Tree Farm Framlingham Road | 13/11/2017 | 1 | |
| DC/17/04375/FUL | Land adjacent to Mill Road (south side of 13 Noyes Avenue) | 23/11/2017 | 12 | |
| DC/17/05227/FUL | Yew Tree Farm Station Road | 13/03/2018 | 2 | |
| DC/17/06313/FUL | Land to rear of Suffolk House, Underlimes and St. Helens, High Street | 13/03/2018 | 1 | |
| DC/17/05818/FUL | Land to rear of Suffolk House, High Street | 22/03/2018 | 1 | |
| DC/18/02051/FUL | Low Farm House Barn Mill Road Laxfield IP13 8HH | 17/07/2018 | 0 | 1 |
| DC/18/03616/FUL | Sandale Banyards Green Laxfield Woodbridge Suffolk IP13 8EU | 29/10/2018 | 0 | 1 |
| DC/18/04432/FUL | Land To Rear Of | 28/11/2018 | 0 | 1 |

| Planning Permission Reference | Site Address | Date of approval | Net dwellings outstanding 2018 | Net dwellings outstanding 2019 |
|-------------------------------|---|------------------|--------------------------------|--------------------------------|
| | Underlimes And St Helens High Street, Laxfield IP13 8DU | | | |
| DC/19/00038/FUL | Land To The East Of Mill Road, Laxfield | 13/02/2019 | 0 | 4 |
| DC/19/01441 | Land To The Rear Of Suffolk House, High Street, Laxfield, Suffolk, | 21/05/2019 | 0 | 3 |
| DC/19/01082 | Land At Chestnut Tree Farm, Framlingham Road, Laxfield, Suffolk | 16/05/2019 | 0 | 1 |
| DC/19/01072 | Barn At Little Meadows Farm Banyards Green Laxfield Woodbridge Suffolk IP13 8EU | 25/04/2019 | 0 | 1 |
| DC/19/00156 | Land to the East of Mill Road, Laxfield, Suffolk | 18/10/2019 | 0 | 13 |
| DC/19/03856 | Prior Approval for Change of Use of Agricultural Building to Dwellinghouse, The Timbers, Banyards Green | 15/11/2019 | 0 | 1 |
| | | | | 26 |

Total relevant permissions = 64