

Campaign Tamage - DC/19/03126 – Comment on Planning Officer’s recommendation.

- a) CIL / s.106 Finance. The recommendation lists under affordable housing (last but one page) contributions for :

Pre-school - £149,364
Primary school - £399,763
Bus service - £50,000
Bus stop kerbs - £5,000
Footpath improvement - £12,500
That is a total of £616,627

There are omissions from that total (a letter from the 13th December updates the requirements of Suffolk County Council, but that is not in the recommendation you have been asked to approve). All the CIL contributions have been cross-checked by the Planning Consultant, Fisher Jones Greenwood, employed by Campaign Tamage and these seem to be contributions required: by Suffolk County Council (response dated 15 July 2019)

Secondary /6th form schooling - £500,236

by NHS West Suffolk Clinical Commissioning Group (response dated 23 July 2019))

Para 6 - “extension, refurbishment or reconfiguration at Long Melford and Lavenham.”

Para 7- “Should the level of growth in this area prove this to be unviable the relocation of services would be considered and funds would contribute towards the cost of new premises”.

No sum is specified. Informal discussions by Campaign Tamage with that NHS office have suggested £500,000 is a likely minimum for option (a). Option (b) would be more.

That brings the probable CIL /s 106 levy to £1,616,863. The recommendation you are being asked to approve seems to be £1.0 million ‘short’ - although the figures in the recommendation are clearly inaccurate).

You may like to ask the Planning department for corrected figures and the Applicant if they would be willing to meet that extra obligation, including that required by the NHS?

- b) Hinterland status of Acton - It has been finally resolved that Acton IS a Hinterland village. The concept of ‘Hinterland’ and is well known, status dependent on the range of facilities servicing the settlement. Bamberg Core Strategy states that Core AND Hinterland villages must contribute 1050 homes between 2011 and 2031. Since 2011 Acton has 123 more houses built or with permission to build and 100 more would mean Acton alone would have contributed hugely to the total for the entire District.

The report in 3.7 (b) (v) states that development under CS11 ‘does not compromise the delivery of permitted schemes in the ‘cluster’.’ Barrow Hill, 100 houses, in Acton is a permitted scheme. Additionally, that Barrow Hill scheme is ‘edge of village’, as noted in the reference to CS 11 in 3.5.

Is that a ‘proportional’ loading on one Hinterland village?

- c) Healthcare – the Finance section above mentions the serious shortfall in Primary Healthcare. Adding more potential patients increases the delay existing patients have to wait to be seen. The Clinical Commissioning Group (letter 23 July) indicates that the calculated current shortfall is 252 spaces, and that is before the houses in Acton are built and leaving out all the other villages that the Long Melford /Lavenham Clinic with its 7,160 patient capacity covers. Other local practices (Hardwicke and Boxford) have had to move to shortened hours. The NHS faces a shortfall of 11,500 unfilled GP’s vacancies.

Would you be happy recommending this development without GPs available in the foreseeable future?

- d) Education – the Finance section explains that children of Primary age at this development would not have access to the local school. Para 11.3 explains that they could never take priority over existing Acton residents’ children to go to the Acton Primary School. This smacks of segregation but that is secondary to the suggested solution of walking access over 1.37 miles of unlit country footpaths to a school that hasn’t been built. Suffolk County Council don’t say when it will be built and expressed surprise over this Application (email document dated 12 September from Peter Freer to Elisabeth Flood.)

Given the safeguarding issue of children as young as 4 years old on this route, is the proposal something you could support?

- e) Site layout – the recommendation to you is to allow the site to be built with the 33% Affordable Housing in 29 houses in one group and nearby a group of 4 in direct conflict with Planning rules that specifically forbid this – Affordable Homes are intended to be integrated in the community to prevent ‘segregation’. Chelmer Housing state (letter 13 February) that it makes it easier to maintain them. It may do, but as the Planning Officer states in 13.1 of her conclusion ‘it makes the tenure of the housing very obvious’. She seems unconvinced it is a good idea.

If it is part of planning policy to scatter Affordable Houses, are you happy to include a serious exception to the rule and support NOT doing so?

- f) Sewage disposal – there is a history of raw sewage overflow from the sewer main in the village spine road (east-west), where the ‘50s sewer takes flow from original houses and infill, from Clay Hall Estate and both sections of the Lime Tree Estate (which alone is over 400 properties) as well as the future 100 houses (Barrow Hill). Gravity takes sewage towards the pumping station between Acton and the treatment plant at Long Melford, (which it is agreed has capacity to treat the effluent). Anglian Water stated that research showed that adding these 100 houses (Tamage Road) suggested an unacceptable risk of flooding. Having seen the Applicant’s proposal, Campaign Tamage, representing existing customers of Anglian Water asked Anglian Water to assess the overall effect on the main sewer to the pumping station, but Anglian Water cannot be definitive that the capacity on that stretch will never allow flooding – nor can they give a definitive answer on why there is flooding already. Adding to the flow on a major scale i.e. 100 houses would add undefinable risk. That is the evidence said to be ‘missing’ in Para 8.2.

Is that a risk that Councillors feel should be taken?

- g) Site access and highway considerations – Para 5.1 of the Planning Officer’s report gives an inaccurate location of the single access to the proposed site. Councillors, many of whom visited the site on 18th September will have been able to assess for themselves the effect of bringing traffic from 100 houses onto the narrow perimeter road of an existing 70’s estate shared with 200+ houses on that estate. Tamage Road is said to be low use and speed, but that is because cars frequently queue to get past parked cars. There are 32 houses on Tamage Road, nearly all of whom use the road for parking – parking spaces in the 1970s were proportional to car ownership and vehicle numbers have increased by 65% in just the last 3 decades. The proposed estate has 100 houses, 88 parking spaces and 10 guest parking spaces and that proportion may work in an urban environment, but not a rural one. The single exit onto Tamage Road is expedient for the Applicant, but makes no sense due to the

way the rest of the village is laid out and the 4 roads in and out of Acton. Bus services to and from Acton are typical of a rural village. There are no evening buses (last one is 7.18pm, none on Sunday or Bank Holidays and the effect of a single £50,000 CIL levy to augment this needs some parameters for how it could be spent. Cycle and pedestrian routes to village amenities have been assessed by Suffolk CC Highways as good (leaving aside the route to the village school, irrelevant because any children on this estate are barred from attending it) and failing to recognise that the footpaths to be used are FOOT paths and cycling on them introduces as dangerous a risk (cycle / pedestrian collision) as cyclists would face by using the roads.

Comment 3.12 states that 'the proposal will generate more vehicle trip'.

Are Councillors happy with approving a site whose access and transport links contain far more hazards and risks than would seem acceptable to existing and future residents?

- h) The real value of a rural location – In Para 7.3, it is stated that the main view that will be lost is from the junction of Tamage Road and Vicarage Lane. That is factually incorrect, as Councillors will have observed on their site visit. The amenity for the very large number of pedestrians who use Tamage Road in a walk on the edge of the village includes the open vista to Cuckoo Tye.

The vista from Tamage Road continues to include Long Melford and beyond to Glemsford. There is some confusion in Para 7.3, penultimate line, as Vicarage Lane turns West at the point described. Although the village edge of Tamage Road is clearly visible, the views towards Long Melford and beyond would be completely blocked by these new houses. Although the Heritage Report states that a Grade 2 Listed Building (The Old Vicarage) would not be markedly impaired by this development, the report fails to point out that non-listed buildings are afforded protection as a Heritage Asset. The house on Vicarage Lane between the development and the Old Vicarage has not been mentioned as a Heritage Asset. It is in fact, one of the oldest houses in the village, far older than the current Old Vicarage. Proposed houses start approximately 40 feet from the front door.

Are Councillors, now given fuller facts, comfortable with approving the site and the resulting loss of amenity available to all as they walk down the road?

- i) True or perceived housing need? – Acton is doing its bit and 100 houses are already on the way in the village. At this point in time, with closure of two major employment sites (Delphi and Philips Avent), no-one seems sure about where the new occupants might work, get there on public transport early in the morning or late at night, how they would get to see a doctor and so on? It's exactly the same question for this Tamage Road proposal, just doubling the numbers.

Can Councillors justify duplicating a local problem?