

## B/17/01009/OUT Comments and Recommendation of Elmsett Parish Council

### Summary of Recommendation

We recommend refusal of the application as it represents a gross overdevelopment in a sole location for the village where the infrastructure serving the existing community is substandard and overstretched.

### General Comments

The parish council discussed this application on the 4th July at a very well attended public meeting, including the Applicant. The general feeling was that the application was far too large for the village and a frontage development would be more appropriate and acceptable to the village. **The applicant informed the meeting that that was all he wanted but in informal discussions with the planning authority he was informed that he should apply for the development of the whole of the field!** We are concerned that in those circumstances the district council is already putting housing numbers and the income from Housing Delivery Grant above the proper consideration of planning policies and scale of the development.

Will you please ensure that our comments are presented to the committee in full.

### Policy Objection including extracts from Babergh Core Strategy

When considering planning applications there is a need to consider how the application sits within the planning policies that pertain. Babergh Core Strategy and Polices 2011-2031 should be your guidance until your new plan is adopted. Reference to Section 2, the Strategy for Growth reveals that your own adopted strategy includes Elmsett as a Hinterland Village

#### Policy CS2: Settlement Pattern Policy

*The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, and retail, etc.) in Babergh will be directed sequentially to the towns / urban areas, and to the Core Villages and Hinterland Villages identified below. In all cases the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new / enhanced infrastructure, as well as having regard to environmental constraints and the views of local communities as expressed in parish / community / neighbourhood plan*

within the Core Strategy there is a section (CS3) which outlines the planned "Distribution of Growth" in Babergh. In the 20 years 2011 - 2031. This states that the plan is for 1050 dwellings in the Core and Hinterland villages, of which there are 10 and 43 respectively. Although it would be incorrect to say there should be an equal division between each, because most should go to the Core villages, if this were done this would equate to 20 dwellings. Thus a development of 41 would be well in excess of our "fair share".

Equally we should not consider the Hadleigh Road development on its own we need to take a more holistic view. That is to say, those dwellings already built within the timeframe, and those of which we have knowledge going forward:

Church View	-	8 dwellings (completed)
Maltings development	-	7 dwellings (planning permission granted)
Hadleigh Road	-	41 dwellings (planning applied for)
Fisons The Street		
opposite Church view	-	15/20 dwellings (outline scheme briefed to Parish Council)
Heathpatch Whatfield Rd	-	10/15 dwellings (outline scheme briefed to Parish Council)
Others	-	?
Total	-	80+

There is also at least one obvious “Brownfield Site” that might yield at least 10 dwellings that is yet to come forward.

The core strategy says ... *Hinterland Villages will accommodate some development to help meet the needs within them. All proposals will be assessed against Policy CS11. Site allocations to meet housing and employment needs may be made in the Site Allocations document where circumstances suggest this approach may be necessary.*

## 2.8.5 Core and Hinterland Villages

*2.8.5.5 ..... In all cases and of paramount importance will be to ensure that overall development throughout the plan period, in any settlement, is in scale with that settlement.*

Note : The siting of 41 dwellings could in no way be considered in scale for a small village.

*2.8.5.6 It will also be important to ensure that any development in the Core and Hinterland Villages is supported by an appropriate level of infrastructure. As with the larger strategic sites, provision of adequate infrastructure to serve developments will be required.*

*..... In considering the cumulative impact, the findings from monitoring the impacts of previous planning applications in respect of the social, physical and environmental impacts and the effects on quality of life within the village will be considered and reflected in the assessment of new proposal*

### *Policy CS11: Strategy for Development for Core and Hinterland Villages*

*Development in Hinterland Villages will be approved where proposals are able to demonstrate a close functional relationship to the existing settlement on sites where the relevant issues listed above are addressed to the satisfaction of the local planning authority (or other decision maker) and where the proposed development:*

- i) is well designed and appropriate in size / scale, layout and character to its setting and to the village;*
- ii) is adjacent or well related to the existing pattern of development for that settlement;*
- iii) meets a proven local need, such as affordable housing or targeted market housing identified in an adopted community local plan / neighbourhood plan;*
- iv) supports local services and/or creates or expands employment opportunities; and*
- v) does not compromise the delivery of permitted or identified schemes in adopted community / village local plans within the same functional cluster.*

*The cumulative impact of development both within the Hinterland Village in which the development is proposed and within the functional cluster of villages in which it is located will be a material consideration when assessing such proposals.*

*All proposals for development in Hinterland Villages must demonstrate how they meet the criteria list above.*

As stated above we are aware of other planning proposals for the settlement where you have had informal discussions and which are being worked upon now and may well be submitted when you come to discuss this application in committee later this year. We very much fear the cumulative effects of these developments. However, we take heart that you have recently refused applications in Core villages that have very much better access to Trunk Roads such as Capel St Mary. We find it difficult to bring to mind any village faced with so much development as Elmsett with such poor infrastructure and public transport.

We cannot see how this development complies with any of your core strategy policies for hinterland villages. There is scepticism in the village about the planning process in that with the failure of Babergh to maintain a 5 year housing supply you are willing to disregard written policy and accept opportunistic development which does not meet the needs of the local population.

## **Highways and Transport**

The roads that provides access to Elmsett are narrow, single track in places and often have long distances between passing bays without intervisibility. There are frequent near collisions and some collisions, thankfully these are mostly non injury and therefore not reported. However, that is down to good fortune and there is no guarantee that the good fortune will continue. 41 new dwellings represents a 15% increase in the size of our village. There is nothing to suggest that an increase of housing stock of 15% will not result in at least 15% more traffic on these roads and, because of the nature of the roads will result in a proportionately higher increase in risk. We say that the highway Authority is wrong in saying that in highway terms there are no objections to the principal of development and that it is also wrong in not recommending refusal of the application or improvements to this substandard network.

## **Education**

Whilst we may satisfy ourselves that Suffolk County Council will obtain the funding for the estimated increase in children for the Hadleigh Road development (see SCC S106 contributions comments) we support some of Elmsett residents' concerns of pressure on education if all this potential building takes place.

## **Broadband.**

Should be included in the S106 as suggested by SCC that the development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion, it also impacts educational attainment and social wellbeing, as well as impacting property prices and saleability. As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections.

The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

## **Other Consultee Comments from website**

We note that the 4 page report from Julia Abbey-Taylor dated 3rd July 2017 has now been superseded by a document of the same title and date but one week later. This is because of the volume of mistakes in the original document which is still on the website for all to see! it was a very poor cut and paste exercise between Elmsett and Lavenham, not really comparable settlements, can we now trust the revised report?

## **Detail Highway Considerations should the District Council be minded to approve the application against our properly made recommendations of refusal. These should become planning conditions.**

The Highway Authority has rightly recommended that Hadleigh Road should be widened to at least 5.5m wide. Unfortunately it would appear that no-one apart from the parish council has surveyed the road and ditch. A few simple measurements reveal that the existing carriageway width varies between 4.6m to 5.2m but the width of the verge from edge of carriageway to the top of the ditch also varies between 0.5m to 0.8m which means that in many places the widening to 5.5m will take the carriageway to the edge of the ditch or even just into the ditch. The ditch is deep and is at least 2m wide at the top. The widening will also result in the Telegraph pole opposite No. 3 Hadleigh Road and the electricity pole opposite Baybrookes needing to be moved as they would otherwise be too close to the new edge of carriageway. In these circumstances the parish council recommends the ditch should be piped (to the approval of the flood authority) and a new continuous indigenous species frontage hedge be planted at the rear of the junction visibility splays with the new footpath sited immediately behind the

hedge. There should be no individual private footpath access to Hadleigh Road in order to discourage parking on Hadleigh Road.

With the proposed new access to the east of Hadleigh Road there is a need to deal with the existing parking on the west side of Hadleigh Road in front of numbers 1 to 6 because that parking will be a problem causing road safety dangers. This is most often prevalent outside numbers 6 and 5 as they have no off road parking.

On the latest submitted drawing the visibility splays are not drawn correctly, to the south it should be drawn tangentially to the curve of the road, no doubt the highway authority will advise.

There should be no road or footway lighting on the site

Because of the number of additional HGV's and builders traffic that will be generated by the construction of these dwellings and on site roads, to say nothing of the provision of utility services we recommend that there should be a properly considered construction management plan that should be adhered to with penalties for breeches. This should include properly constructed access to the site from the very outset with off road parking provision for builders and other contractors vehicles as well as permanent road cleaning and sweeping for Hadleigh Road throughout the length of the construction of the development.

## **Conclusions**

We say that this proposed development should be refused because it is not sustainable, is not in scale with the settlement, it does not comply with any of the core strategy policies and it is far too large for the capacity of our rural road network and transport infrastructure we also say that it would be unsafe for you to rely on the comments of the Highway Authority which are not supported by empirical evidence.

The approval and subsequent occupation of 41 new dwellings will lead to road safety dangers on a daily basis over the whole life of the development.