

24 September 2019

Babergh Mid Suffolk Joint Local Plan Preferred Options (Regulation 18), Public Consultation, September 2019

Having reviewed the draft local plan policy documents, the Society has the following comments on the Site Specific Allocations and District Wide Strategic Planning Policies. These will be submitted via the online consultation portal.

Vision and Objectives:

Economy – SPS objects to the objective of supporting the ‘Ipswich Northern Route’, a SCC proposal which is at a very early stage of consultation. SPS objects to the principle of further road building in Suffolk instead calling for enhanced investment in sustainable modes of transport together with strategic improvements to the existing road network.

Environment – this should include reference to the ‘historic environment’ to be consistent with the Key Environmental Issues listed which includes heritage assets.

Strategic Planning Policies:

SP03 – Settlement Hierarchy – SPS supports the approach of the settlement hierarchy but has the following comments on the policy wording. Point (A) should include regard to the *historic* environment. Point (D, I) should include reference to development being sympathetic to the *existing pattern of development*.

SP10 – Climate Change – SPS supports the inclusion of this policy but this should require under points c) and d) that developments take into account their impact on the historic environment and the landscape and incorporate appropriate and effective mitigation.

Local Policies

LP01 – Hamlets and Clusters of development in the Countryside – to be clear the terminology used throughout the Local Plan needs to be consistent. Assuming they are the same, this policy should refer to ‘Hamlet Villages’ rather than ‘Hamlets’ to be in line with the policy SP03 which sets out the different settlement types.

The policy is not in line with policy SP03. SP03 sets out 4 criteria which must be met for development within the settlement boundaries of Hamlet Villages to be ‘permitted’, whereas point 1 of policy LP01 states that this development will be ‘acceptable’ in principle with no

criteria attached. This appears more permissive and therefore for consistency the criteria set out in SP03 should be included here.

Policy LP01 point (d) requires amendment to include the setting of heritage assets (which includes conservation areas) and the setting of the AONB.

LP18 - Landscape – SPS supports the principle of a policy protecting and enhancing the landscape.

However point (a) requires redrafting and/or further explanation as its sense is currently unclear.

SPS understands that the Special Landscape Area designation is not being taken forward and is concerned that, outside the AONB, the local plan no longer identifies any sensitive landscapes which merit special protection from inappropriate development. We therefore welcome the inclusion of references to the Local Landscape Guidance, Suffolk Landscape Character Assessment and Settlement Sensitivity Assessment in point (d). However reference to Neighbourhood Plans, where relevant, should also be included here as they include landscape policies, views analysis, character and sensitivity assessments.

Local Green Spaces should also be identified in the absence of the Special Landscape Area designation. Para 16.03 explains that Neighbourhood Plans can designate these but SPS is concerned that this will result in important green spaces throughout extensive areas of the districts, where Neighbourhood Plans are not in place, being unprotected. The NPPF at para 99 is clear that local plans are also a mechanism to identify and protect green areas of particular importance as Local Green Spaces and we urge that this piece of work is undertaken by the district authority where Neighbourhood Plans are not underway.

LP19 – Area of Outstanding Natural Beauty – SPS supports a separate AONB policy but objects to the proposed wording which is too permissive and not in line with national guidance. The NPPF is more restrictive to development within an AONB: at para 172 it states that *the scale and extent of development within these designated areas should be limited* and that major development should be refused other than in *exceptional circumstances*. LP19 policy, at point (b) should also refer to the effect on the *special qualities* of the AONB. Furthermore the policy requires supporting text in line with other policies in the plan.

LP20 – The Historic Environment – SPS supports the inclusion of a policy protecting the historic environment. The level of detail included within the draft policy with respect to works to listed buildings is also welcomed. However the historic environment includes conservation areas and the setting of listed buildings which are not covered by this policy. Therefore the policy should be expanded to include development within conservation areas and within the setting of heritage assets. We also consider that point (g) requires rewording as it does not follow the positive approach advocated by the NPPF.

LP24 – Design and Residential Amenity – SPS welcomes the policy's focus on new development responding to the local context. In light of the recommendations from the government's Building Better, Building Beauty commission (July 2019), SPS considers that

this policy should go further to achieve high quality design by positively encouraging the use of Design Codes and guides and engagement between developers and the Suffolk Design Review Panel.

LP25 - Energy Sources, Storage and Distribution - SPS support the requirement in point a) for schemes to take into consideration the impact on the landscape and heritage and to be appropriately and effectively mitigated. We also support the requirement set out in point d) for applicants to demonstrate that there are no alternative sites within the district where the proposals impact on heritage assets or are in designated landscapes.

We would urge that this policy includes reference to electricity pylons and low voltage power lines, encouraging undergrounding of new and existing overhead lines in sensitive landscape areas, particularly the AONB.

LP28 – Designated Open Spaces – SPS welcomes the statement in para 16.1 that open spaces can play an historical and environmental role as well as being public amenity spaces. However the policy maps show that the open spaces which have been designated, and therefore are afforded a degree of protection by LP28, are restricted to sports areas and allotments. Visually important open spaces should also be identified, and other spaces identified in the 2019 Open Space Assessment should be carried forward onto the policy maps.

Local Green Spaces should also be identified in the absence of the Special Landscape Area designation. Para 16.3 explains that Neighbourhood Plans can designate these but this will result in important green spaces throughout extensive areas of the districts, where Neighbourhood Plans are not in place, being unprotected. The NPPF at para 99 is clear that local plans are also a mechanism to identify and protect green areas of particular importance and we urge that this piece of work is undertaken by the district authority where Neighbourhood Plans are not underway.

Site Specific Allocations

In all cases we object to the use of the term ‘close setting of heritage assets’ within the policies accompanying the site allocations. It is unclear what the term ‘close setting’ refers to but it is not helpful in protecting the significance of heritage assets which may have extensive settings which contribute to the significance of the asset.

The term is not compliant with the NPPF which defines ‘setting’ as *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.* Para 194 requires: **Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from *development within its setting*), should require clear and convincing justification**(my emphasis).

The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) is clear that:

- *Setting is separate from the concepts of curtilage, character and context. Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage.*
- *Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.*

In all cases 'close setting' should be replaced with 'setting'. The extent of an assets setting and the contribution it makes to the significance of a heritage asset should be assessed for each proposal.

We have specific objections and/ or comments on the following sites:

LA008 – Copdock and Washbrook – this is a major site immediately adjacent to 3 grade II listed buildings. In order to limit the impact on the setting of the listed building we would urge that buffer areas are included in the site layout in addition to appropriate landscaping and planting.

LA012 – Sproughton – SPS objects to this allocation. This site is subject to a current planning application which we have objected to on the grounds of its disproportionate scale which fails to reflect the special character and morphology of the village and its rural landscape setting.

LA013 – Sproughton – SPS objects to this allocation due to the impact on the listed properties (Red House Farm and Springvale) and the registered part and garden (Chantry Park). The significance of these important heritage assets will be harmed through this major development within their countryside setting on the edge of Ipswich.

LA048 – Bildeston – SPS objects to the location of this site for 75 houses due to the impact the extra traffic generated will have on the narrow historic street of the Bildeston Conservation Area. The High Street is lined by grade II listed buildings, most of which are back edge of pavement, and has narrow pavements. We consider that this proposed allocation raises highway safety and heritage concerns and should be removed from the plan.

LA051 – Botesdale and Rickinghall – SPS objects to the inclusion of this site. This site is not included in the adopted Botesdale and Rickinghall Neighbourhood Plan. It is on a greenfield site within the setting of the conservation area and a number of listed buildings.

LA057, LA056, LA058 – Debenham – these sites are all identified in the Debenham Neighbourhood Plan as suitable for development.

LA074 – Mendlesham - SPS objects to this allocation. This site is subject to a current planning application which we have objected to on the grounds that it is clearly contrary to

the Mendlesham Neighbourhood Plan and would have a detrimental impact on the countryside edge of village.

LA075 – Shotley Street – SPS objects to this site being developed due to the harm which will result to the historic character of the settlement. The site surrounds the only listed building in the settlement, grade II listed Rose Farm, and the proposed 50 houses will significantly impact the setting of the farmhouse and its associated outbuildings. Moreover this site encompasses the footpath which is the historic link between Rose Farm and the isolated Rose Farm Cottages and Cockle Creek Cottage on the estuary within the Suffolk Coast and Heaths AONB. We note that the site is included in the July 2019 SHLAA which recommends a lower density development to mitigate a recognised heritage impact. However this approach fails to understand the concept of harm to the significance of heritage assets as the development will remove the link between the farmhouse and its historic agricultural setting. We consider that this site should be removed from the local plan and more appropriate sites, such as opposite the school, be considered for housing.

LA078 – Stowupland – SPS objects to the inclusion of this site. The site is not included as a site allocation in the adopted Stowupland Neighbourhood Plan and is therefore clearly contrary to the development aspirations of the community. The site in its undeveloped state prevents the coalescence of Stowupland and Stowmarket, as required by Neighbourhood Plan policies SNP1 and SNP8 and the 2013 Stowmarket Area Action Plan which at para 6.38 states that an *acceptable degree of separation* between Stowmarket and surrounding villages should be safeguarded and *the importance of maintaining the separate identity of Stowupland and Stowmarket* is a key issue (para 6.42). Map 9 in the Neighbourhood Plan clearly identifies part of the site as a green buffer and also identifies a number of key views over the site from Mill Street. Development of this site will also significantly and harmfully erode the setting of 6 grade II listed buildings on Mill Street.

LA079 – Stowupland – SPS objects to the inclusion of this site. The Neighbourhood Plan clearly shows that this site includes an area designated as Local Green Space. Although this is referred to within the policy LA079 we consider that the development of this site will significantly impact the character of this space, undermining the purposes of its designation within the Neighbourhood Plan.

LA080, LA081, LA082, LA083 – Stradbroke – these sites are all identified in the Stradbroke Neighbourhood Plan as suitable for development.

Settlement boundaries

Chilton - We note that the settlement boundary is drawn tight to the health centre and excludes the land to the north and east. This is welcome as we consider that any future development of this land must respect the important heritage assets of Chilton Hall and Chilton Church.

Little Waldingfield – the proposed settlement boundary is shown to include an open area opposite grade II listed Wood Hall. This encompasses site SS0874 in the July 2109 draft

SHELAA. However, this important historic open space, which is included within the conservation area boundary, affords views and an historic footpath which links Wood Hall directly with grade I listed church of St Lawrence. The Conservation Area Appraisal highlights the importance of this link between the two heritage assets: *To the north of the Church there are a number of old Lime trees, the last remnants of an avenue that went from there across the field to Wood Hall. A footpath still defines this route.* This area should be protected from development and should not therefore be included within the settlement boundary.

Metfield – the settlement boundary to the east of the village should be redrawn to align with the edge of the conservation area. Development on this site will harm the rural setting of the conservation area and the setting of the listed cottage to the south of the village.

Stoke by Nayland – the settlement is wholly within the AONB. SPS notes the inclusion of land to the north of the narrow stretch of the B1068 between School Street and Polstead Street adjacent to listed cottages. This land is within the conservation area and, in order to preserve the character of the conservation area, we consider it should remain outside the settlement boundary.

Thornham Magna – settlement boundary to include an area behind The Old Post Office, The Street. Thornham Magna is a linear settlement with most properties facing the Street and little backland development. The protrusion of the settlement boundary into the countryside is illogical and entirely contrary to this established settlement form. The land was recently put forward for an outline development of 7 dwellings which was dismissed at appeal APP/W3520/W/18/3214007. The Inspector concluded that the development would *significantly and harmfully* erode the setting of heritage assets. He also concluded that the modest impact on the landscape and the notable impact on the character of the settlement, in combination, *would harm the character and appearance of the area.* This site should not be included within the settlement boundary which should be drawn more tightly in accordance with the grain of the settlement.

Cc:

Phil Butler, SPS Mid Suffolk District

Bildeston, Chilton, Little Waldingfield, Mendlesham, Sproughton, Stowupland Parish Councils

Thornham Magna Parish Meeting

Beverley McClean, AONB group

BMSDC Heritage Team