

This representation is being sent by the Parish Clerk on behalf of Tuddenham St Martin Parish Council.
(Emailed on 21st February 2019 to suffolkcoastallocalplan@eastsoffolk.gov.uk and acknowledgement received)

This representation on the legal compliance and soundness of the Final Draft Local Plan is in relation to **Final Draft Local Plan – 12 Strategy for the Rural Areas – Land off Keightley Way Tuddenham – Policy SCLP12.67: Land off Keightley Way, Tuddenham.**

This Policy fails the test of Soundness as it has not been Positively Prepared, is not Justified, is not Effective and not Consistent with national policy. Traffic issues raised by comments to the First Draft Local Plan have not been addressed.

The National Planning Policy Framework states that development should promote sustainable transport with any issues being considered at the earliest stages. Such issues include addressing the potential impact of traffic and traffic infrastructure to the environment (including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains). Transport issues should also be considered at the earliest stage so that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. Planning policies should be prepared with the active involvement of local Highways. In assessing sites it should be ensured that appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, given the type of development and its location. It should also be ensured that safe and suitable access to the site can be achieved for all users and any significant impacts, including capacity, congestion and highway safety can be cost effectively mitigated to an acceptable degree.

The road network through Tuddenham St Martin has not been accurately assessed, in connection with the land allocated under Policy SCLP 12.67, in order to ensure that issues identified above are addressed. It is also unclear how an assessment for sustainable transport (to comply with Policy SCLP7.1 – Sustainable Transport – to reduce travel by vehicular modes) will be achieved for this location as the allocation number of dwellings does not meet or exceed the indicative number of dwellings needed for a Transport Statement, Assessment or Plan as detailed on page 121 of the Final Draft document.

The highway network for the village, including Main Road, The Street and Grundisburgh Road are narrow, on a steep gradient at certain points and suffer from poor visibility. Coming in from Ipswich the road width will only allow one large vehicle to pass and if two large vehicles need to pass each other they often get stuck. In addition vehicles are parked on the northern side of High Street/The Street by the owners and/or occupiers of existing properties within the village. This reduces the road network to single file traffic for an extended stretch at the point where there is poor visibility. This already causes congestion without the additional traffic which new development would bring, both at the land allocated under Policy SCLP 12.67 and the surrounding areas.

The access road (High Street) to Keightley Way itself is narrow in construction and it is further narrowed by parked vehicles. Westerfield Lane is a single vehicle road with passing places. The junction from Main Road to High Street is on a blind corner and is extremely tight. Larger vehicles such as construction vehicles, delivery vans, lorries and emergency vehicles would not be able to turn right to gain access, as is experienced currently when such vehicles require access.

In addition, the bus from Ipswich currently stops at the junction in question and this is not safe for road users or those using public transport.

The National Policy Framework also requires suitable access for those with disabilities. There is no footpath from the village to Keightley Way and often the available footpath further down the highway cannot be used in any event due to the parked vehicles.

The development in its current size is not proportionate in scale to the existing transport network which is already at capacity. It does not provide safe pedestrian and cycle access to services and facilities. A new footpath from the development to the recreation ground is not sufficient and will only serve a small percentage of those who occupy the new development. It does not protect and enhance existing routes and will not improve public transport.

Overall the cumulative impact of the new development, in addition to other development in the local vicinity, will create severe impacts on the existing transport network.

This Policy does not comply with the Suffolk Coastal District Council Statement of Community Involvements in that it did not consult with the Parish Council regarding the change in allocated dwellings on this site.

The proposal in its present form is contrary with Policy SCLP3.2 – Settlement Hierarchy, in which paragraph 3.40 on page 40 states that ‘too much development, too soon, and of the wrong type can damage the environment and local distinctiveness and thereby impact the quality of life’.

The proposal in its present form is contrary with Policy SCLP3.5 - Infrastructure Provision, which is detailed in pages 56 and 57 of the document. This is especially in view of the consultation comments put forward by The Environment Agency and Suffolk County Council. Page 696 of the Consultation Statement of the Final Draft stated:

a) ‘The Environment Agency comment that further to site specific comments Aldeburgh, Framlingham and Tuddenham (Ipswich) Water Recycling Centres (WRCs) are all currently discharging over their maximum allowed consented Dry Weather flow. Any further growth and development should not be allowed to connect into the foul infrastructure at these sites until upgrades have been completed. The lack of capacity at these sites should be highlighted and a reference to phased development should be incorporated in line with timeframes for necessary upgrades presented.’

b) The County Council commented that ‘the scale of growth proposed in the Ipswich area is likely to put significant strain on the strategic road network managed by Highways England, and the main local roads managed by Suffolk County Council, and funding from development will be required and over reliance should not be placed on unconfirmed sources of funding.’

The proposal in its present form contravenes the District Council Housing strategy for small villages (Policy SCLP5.2) which states that permitted development should be ‘A small group of dwellings of a scale appropriate to the size location and character of the village’. Previous developments in the village over the past 40 years have been:

Oak View/The Paddocks	11 dwellings
The Paddocks (initial development)	3 dwellings
The Granaries	5 dwellings
Westerfield Lane (Allotment site)	5 dwellings
Westerfield Lane (bungalows)	8 dwellings

This being so, the proposed development of 25 houses is too large and will affect the character of the village. Any development should be restricted to a number which would not affect the character of the village (and not be out of line with previous pattern of development).

The proposal in its present form is contrary with Policy SCLP12.34 – Strategy for the Rural Areas. This includes page 293 of the Final Draft document which states ‘--- diversify the mix of housing available, particularly for the older population’. This was also a comment put forward by the Parish Council to the consultation and ignored in the Final Draft.

In addition to this paragraph 12.779 on page 395 of the Final Draft document (relating to Policy SCLP12.67) also states that ‘Northgate High School is expected to exceed capacity’ (this is the catchment school for the village). The Parish Council question this statement and feel it is incorrect as the school has exceeded capacity for a number of years. The PAN (published admission number) for Year 7 pupils for the school increased in recent years to 252. The number of applicants for 2018/19 was 407*. The number of applicants for such a popular school is bound to exceed the PAN, but the criterion under which the last child was admitted was – catchment distance 1.124 miles*. The distance from Northgate High School to Tuddenham St Martin (Wayside Main Rd, which is closer to Northgate High

School than most houses in the village, being used as a location for distance calculation) is 1.41 miles so too far from the catchment school to gain entry.

*figures obtained from Suffolk County Council Directory of Schools in Suffolk (secondary).pdf.

The proposal under Policy SCLP12.67 fails the test of Soundness and is not justified, and is not legally compliant as it is contrary to the District Council Statement of Community involvement in that it does not take into account reasonable alternatives. Sites put forward in the village (including alternative sites) were:

- Site 135 - Land at Keightley Way.
- Site 216 - Land adjacent to Hilltop Westerfield Lane (already included in the Local Draft).
- Site 1154 - Land at Main Rd and The Street (new proposal after the First Draft).
- Site 1155 - Land South of Main Road, adjacent to Fynn Valley Farm (new proposal after the First Draft).
- Site 1164 - Land adjacent to Wayside, Main Road (new proposal after the First Draft).

Alternative sites, except Site 1164, were assessed by the District council as having development potential but were dismissed in preference of the original chosen site. The viability and desirability of alternative sites, put forward after the First Draft, were dismissed by the District Council without discussion with the Parish Council and without consultation. The proposal in its current form is not Sound as it does not meet the needs of the village as evidenced in the Village Review & feedback from an open forum (submitted to the Local Plan First Draft). Residents prefer to have infill/small developments on several sites rather than one large development. The consensus of Parish Councillors, at a recent meeting to consider representation to the Final Draft Local Plan, was to support 3 smaller sites (i.e. Sites 135, 216, and 1155) in the village instead of the larger allocation on the sole Keightley Way land site allocated by the District Council, but not to support Site 1154 as its availability is not known and it is larger than the Keightley Way Site. Parish Councillors considered that a better alternative would be: Site 135 (Keightley Way) for maximum of 12 houses, Site 216 (Land adjacent to Hilltop, Westerfield Lane) for a maximum of 4 houses and Site 1155 (Land South of Main Road, adjacent to Fynn Valley Farm) for a maximum of 8 houses. All to be developed at different times to lessen impact and provide controlled housing growth in line with previous village developments patterns, and not unduly impact on the character of the village. Parish Councillors at the meeting particularly favoured site 1155 and would seek to be included in discussions.

Tuddenham St Martin Parish Council wish to participate in the public examination on this Policy and consider it necessary for the reasons given above.

Kind regards, Mrs C Frost (Parish Clerk – Tuddenham St Martin). (Parish Council email address provided).