

**Minutes of the Tuddenham St Martin Parish Council Meeting held on 29<sup>th</sup> January 2019 at 7.30pm in the Village Hall**

**Present: Ms P Procter (Chair), Mrs J Ellinor (acting as Clerk), Mr D Lugo and Mr H Brightwell**

- 1. Chairman's welcome & apologies.** Apologies were received from Mr W Pipe, Mr T Beckett and Mr. P Hodge. It was unanimously agreed that Ms Procter would chair the meeting in absence of Mr Pipe and the interest to be declared by Mr Brightwell. Approximately 40 residents attended. Ms Procter welcomed everyone present and gave some background information regarding the planning strategy for Tuddenham. Ms Procter explained about the Village Review held in April 2016 (which has formed the cornerstone of the Parish Council's philosophy on planning & development) and mentioned key points relating to development identified in the Review. Ms Procter reminded residents present that they were invited by the District Council to make their own representations on the Final Draft Local Plan to the District Council.
- 2. Declaration of interest.** Mr Brightwell declared an interest in Site 1155 and excused himself from the Council. He remained in the public forum but left the meeting before discussion of the Alternative Sites (which included Site 1155)
- 3. Public Forum.** A resident, who is also a member of SOCS (Save Our Country Spaces resident group), reported that SOCS are tracking the Local Plans for both Suffolk Coastal District Council and Ipswich Borough Council. She advised members of the public that both authorities are working together and stressed that representations should be made on the grounds of legality and soundness. A resident expressed disappointment that the District Council had ignored the 50+ objections submitted following the First Draft. He was also disappointed that Tuddenham Parish Council did not stress the traffic/road safety issue more in their response. He then raised several points for representation (see Appendix 2). Another resident raised objections that the Final Draft did not comply with the National Framework (see Appendix 3). Other comments expressed from residents present were disappointment that the Village Review Report was not being taken seriously by the District Council, Westerfield Lane is dangerous, that there had been 2 accidents on the lower part of Westerfield Lane in 2 years and traffic volume is getting worse. The feeling was that the District Council had taken the "easy option" by merely sticking with site 135 and just reduced the number of dwellings. Alternative sites had not been properly considered. Also the amount of £100k mentioned on page 452 did not seem adequate to pay for the access required. A point was raised regarding the effect on Air Pollution by increased traffic.
- 4. Planning Matters**
  - a) Representations from the Parish Council on Legal Compliance & Soundness of the Suffolk Coastal Final Draft Local Plan including:**
    - **Policy SCLP 12.24 Land at Humber Doucy Lane.** It was agreed to make representations on the basis of both Soundness & Legality – it does not comply with the Suffolk Coastal District Council Statement of Community Involvements as the Parish Council had not previously been consulted regarding this site (it was not mentioned in First Draft of the Local Plan). It fails the test of Soundness as it has not been Positively Prepared in that it does not meet the needs of Tuddenham St Martin as evidenced in the Village Review 2016 (communicated to the District Council Planning Dept. in various meetings), and in that development of this

site would hasten the encroachment of Ipswich towards Tuddenham. The Ipswich Borough Council Local Plan Draft had been received recently via email (including details of the proposed development of this site) and the Parish Council would fully discuss this at the next meeting prior to replying by the deadline date of 25<sup>th</sup> March 2019.

- **Policy SCLP 12.67 Land off Keightley Way Tuddenham.** It was agreed that comments put forward in the public forum portion of the meeting would help form the representation from the Parish Council, but also include specific Representations raised by 2 residents (see Appendix 2 and Appendix 3).

Furthermore the Council wished to make Representation in that this draft of the Plan contravenes the District Council Statement of Community involvement in that it did not consult with the Parish Council regarding the reduction in allocated numbers at the site.

Also the proposal in its present form contravenes the District Council Housing strategy for small villages (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 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).

This proposal in its present form is also contrary to SCLP3.2 – Settlement Hierarchy, in which paragraph 3.40 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 fails the test of Soundness – it is not justified as it does not take into account reasonable alternatives (alternative sites were dismissed by the District Council without discussion with the Parish Council). The Village Review and feedback from the meeting showed that residents would prefer several smaller developments rather than one large site.

- **Alternative Sites**

Alternative sites were assessed as having development potential but were dismissed by the District Council who preferred the original site. Availability of site 1154 was not known, however Sites 216 and 1155 are available and should be considered and the Parish Council should be involved in discussions.

Therefore the proposal in its current form fails the test of Soundness – it is not Justified as reasonable alternatives were not taken into account.

The proposal in its current form is not legally compliant – it does not comply with the District Council Statement of Community involvement as the Parish Council were not consulted as to the viability/ desirability of all Sites put forward after the First Draft.

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. Residents prefer to have infill/ small developments on several sites rather than one large development. Following discussion regarding alternative sites, the consensus of Parish Councillors was to support 3 smaller sites (i.e. Sites 216, 135 and 1155) in the village instead of the sole Keightley Way land site allocated by the District Council, but not to support Site 1154 as we don't know its availability and it is larger than the Keightley Way Site. Having Site 135 (Keightley Way) for maximum of say 12 houses, Site 216 (Land adjacent to Hilltop, Westerfield Lane), for 4 houses & Site 1155 (Land South of Main Road, adjacent to Fynn Valley Farm) for 8 houses (all to be developed at different times to lessen impact) would provide controlled housing growth in line with previous village developments patterns, and would not unduly impact on the character of the village. Parish Councillors particularly favoured site 1155.

The proposal in its current form fails the test of soundness in that traffic issues have not been addressed.

It was also agreed to incorporate points emailed to the Parish Council prior to the meeting from the Clerk, who was absent from the meeting, with regards to capacity of schools and lack of infrastructure.

**5. Items for next Agenda.** Ipswich Borough Council Draft Local Plan (Land off Humber Doucy Lane). Parish Clerk's Salary – Annual Review, Parish Councillor Vacancy.

**6. Date of next Meeting.** 5<sup>th</sup> March 2019

Meeting closed at 9.35pm

Mrs J Ellinor, Parish Councillor.

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**Appendix 1 – Notes submitted by Parish Clerk prior to the meeting, which were made as an addition to those already expressed by Parish Councillors.**

These are some (personal) thoughts, for the Parish Council to consider when making a representation to the Local Plan Final Draft.

Policy SCLP12.24 – Land at Humber Doucy Lane. Not enough information was and is provided about this allocation. Especially as it is now highlighted in the Final Draft to alleviate early years provision in the local area. Local primary schools are either close to or already exceed capacity and the limited information available is that 0.1ha of land under Policy SCL12.24 is used as a new setting for early years provision (an additional primary school) under the following policies:

- SCLP12.52 – allocation of approximately 70 dwellings at Grundisburgh.
- SCLP12.59 – allocation of approximately 60 dwellings at Otley.
- SCLP12.67 - allocation of approximately 25 dwellings at Tuddenham.
- SCLP12.68 - allocation of approximately 20 dwellings at Westerfield.
- SCLP12.71 - allocation of approximately 30 dwellings at Witnesham.
- SCLP12.72 - allocation of approximately 20 dwellings also at Witnesham.

The Policies Maps still does not include a map showing Policy SCLP12.24.

Policy SCLP12.67 – allocation of approximately 25 dwellings at Keightley Way.

- Is contrary in its present form 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’.
- Is contrary in its present form 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.’

- Is contrary in its present form with Policy SCLP7.1 – Sustainable Transport, in that it will not reduce travel by vehicular modes. There is no detail in Policy SCLP12.67 of how sustainable transport will be achieved from this location and the allocation number does not meet or exceed the indicative number of dwellings needed for a Transport Statement, Assessment or Plan (page 121 of the Final Draft document).
- Is contrary in its present form 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.

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 incorrect as the school has exceeded capacity for a number of years (I know from personal experience). 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 used as a location for distance calculation) is 1.41 miles so another year Tuddenham St Martin children would not have gained access to the catchment school.

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

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## Appendix 2 – Representations from a resident agreed to be included in the Minutes

Notes from my representation as follows:

Acknowledged the hard work of the Parish Councillors. Expressed disappointment in the Parish's response to the Draft Plan, not enough emphasis was placed on the highways/infrastructure inadequacies which was the primary concern of all the villagers who attended the August consultation.

Confirmed that representation could now only be made on the grounds of 'Legal Compliance or Soundness'. Of the four tests of Soundness, I do NOT believe that the Local Plan has been made in line with point 4, 'the Government's National Policy Framework (July 2018)'

I then read the following excerpts directly from the National Policy Framework:

#### 9. Promoting sustainable transport

102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Considering development proposals

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Asked that the Parish, as a result of the very strong opposition evident by the attendance at this meeting, make a formal representation opposing the Final Local Plan on the grounds of 'Soundness'. Requested that the Parish's response be circulated prior to being submitted to the District Council.

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 impact of traffic to the environment and infrastructure and reviewing patterns of movement, streets, parking etc. Planning policies should be prepared with the active involvement of local highways. In assessing sites it should be ensured that safe and suitable access to the site can be achieved 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 SCLP 12.67 in order to ensure that issues identified above are addressed.

Main Road/The Street/Grundisburgh Road through the village 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. This was experienced in 2018 when two large vehicles were stuck on the hill out of the village. 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 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 parking places. The junction from Main Road to High Street is on a blind corner and is extremely tight. The average size vehicle struggles to turn left from Ipswich onto High Street and this requires you to risk an accident with oncoming traffic in order to widen the turning circle. Once you have turned you may then not be able to continue if there is oncoming traffic due to the parked vehicles. Larger vehicles such as construction vehicles, delivery vans and lorries and emergency vehicles would not be able to turn right to gain access. They would therefore need to maneuver through the village in order to find somewhere to turn around.

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

The National Policy Framework also requires suitable access for those with disabilities. The footpath does not extend from the village to Keightley Way and often you cannot use the footpath in any event due to the parked vehicles.

The development 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.