

WICKHAM MARKET PARISH COUNCIL



Chairman: Cllr Ivor French

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Mr P. Perkin
East Suffolk Council
East Suffolk House
Station Rd, Melton
Woodbridge
Suffolk. IP12 1RT

15th October 2020 By Email

Dear Mr Perkin,

**RE: PLANNING APPLICATIONS DC/20/3361/FUL & DC/20/3264/FUL
LAND BETWEEN HIGH STREET AND CHAPEL LANE, PETTISTREE, SUFFOLK
RESIDENTIAL DEVELOPMENT OF 129 DWELLINGS (INCLUDING AFFORDABLE
HOUSING) TOGETHER WITH PUBLIC OPEN SPACE, ROADS, ACCESSES, PARKING,
GARAGES, DRAINAGE AND ASSOCIATED INFRASTRUCTURE; (II) OUTLINE
PLANNING APPLICATION - 7 NO. SERVICED SELF BUILD PLOTS WITH
ASSOCIATED ACCESS AND INFRASTRUCTURE.**

Wickham Market Parish Council held a virtual Planning Committee meeting on 5th October 2020 in order to consider the above mentioned planning applications. This meeting was extremely well attended. An informal meeting was also held with representatives from Pettistree Parish Council and as a result of this meeting I can confirm Wickham Market Parish Council agrees with the **STRONG OBJECTIONS** raised by Pettistree Parish Council in respect of these applications.

Wickham Market Parish Council wishes to stress the comments below relate to **both** planning applications even though Wickham Market were only consulted on **DC/20/3264/FUL (although at a later stage than Pettistree Parish Council)**.

Wickham Market Parish Council **STRONGLY OBJECTS** to **both** planning applications. The site is agricultural land between the High Street (B1438) and Chapel Lane. The land is within the Parish of Pettistree but the area of the proposed development has been designated within an extended settlement boundary for Wickham Market. The Parish Council understands this has been sanctioned by the recent adoption of ESC's Local Plan, but I wish to point out this is still a matter of protest from Pettistree Parish Council and Wickham Market Parish Council. Wickham Market Parish Council objected to Policy SCLP 12.60 as stated within their responses sent dated 12th September 2018 and 20th February 2019.

Strong Objections raised previously to this policy and the process as to how it got into the Local Plan still stand, as follows:-

- The site is not within the Wickham Market Parish or Neighbourhood Plan (NP) area. The site is within the Settlement Boundary and it does not comply with the NP policies and objectives.
- The site is 6.15ha which gives a housing density of 24 dwellings per hectare. This is significantly in excess of the 15 dwellings per hectare stated within the SHELAA as the housing density to use for this area.
- The residents of the proposed new development would use the services of Wickham Market being the nearby Service Centre. ESC has extended the Village Settlement Boundary to capture the allocation, but Wickham Market Parish Council would not automatically receive any CIL payment for this development. This will result in the residents of this proposed development paying a lower amount of Parish Precept to Pettistree Parish Council and could also allow Pettistree Parish Council to significantly reduce their Parish Precept if they wish which could create friction within the local community.

The **MAIN OBJECTIONS** to the **two** applications are as follows:-

It should also be noted that the previous issues raised following the Hopkins Homes Consultation Event have also been largely ignored with only minor amendments made to the proposed layout of houses.

DESIGN AND APPEARANCE

- Poor design and lack of specific street scenes and elevations across the site area to enable a thorough understanding and assessment of both design and visual impacts. This is unacceptable.
- The site is 6.15ha which gives a housing density of 24 dwellings per hectare. This is significantly in excess of the 15 dwellings per hectare as stated within the SHELAA as the housing density to use for this area.
- The scale and nature of this development would bring a liability to further second home owners bringing a high risk of loss of any sense of community life within either village.
- The adopted policy SCLP 5.1 requires that development must be of a scale appropriate to the size, location and character of the village. The proposed development clearly does not adhere to this policy and is an overdevelopment of the site.
- Lack of connectivity to the neighbouring development at Wickham Place. This is not compliant with both national and local guidance, connectivity encourages social cohesion.
- There is no provision in the plans to support Green Energy Initiatives.
- The homes have no scheme for Solar Panels to generate electricity.
- With regards to Electric Vehicle charging points there is no evidence that each dwelling has: Ducting and suitable consumer unit to allow the install of one wall charging unit per dwelling when required by householder.
- The Local Plan, in SCLP 9.2, requires higher energy and water efficiency standards. In the Planning, Design and Access Statement it states: “6.62 In accordance with Policy SCLP 9.2 the proposal will be required to deliver higher energy and water efficiency standards. As set out in the submitted Sustainability Statement, it is proposed that the required 20% reduction in carbon emissions will be achieved using low carbon technology” and/or onsite renewable energy options where practically achievable”. This development falls well below the expected standards.
- Within Wickham Market’s emerging Neighbourhood Plan the relevant policy is:
POLICY WICK5: DESIGNING FOR RENEWABLE ENERGY AND CARBON REDUCTION
All developments must be designed so that it results in at least a 20% reduction in CO₂ emissions below the Target CO₂ Emission Rate (TER) set out in the Building Regulations. This requirement is more stringent to the Local Plan where it only applies to developments of over 10 dwellings.

All developments should achieve water efficiency (achieving the optional technical standard for water efficiency) through the use of grey water, rainwater harvesting and SuDS schemes. Site layout should be designed to utilise and benefit from natural sunlight and solar gain incorporating solar energy generation measures on all houses. All new development should make provision for electric charging facilities on site.

- Residents in the existing Hopkins Homes development Wickham Place will be overlooked, especially at the South-Western boundary.
- Plans for hedgerows and trees to screen the new development in order to try and minimize coalescence of the settlements is inadequate and will not screen the dwellings from the wider countryside on rising ground. The cross section shown on the plans is misleading as it does not show the buildings on the rising ground and is chosen to show only the wider part of the hedging at the South-Western boundary corner.

LANDSCAPE

- SCLP 10.4 highlights the need to promote high quality design across the plan area. It sets out the need to ensure that development is of a scale that is appropriate to landscape character and will protect and enhance this character.
- The supporting text in the Local Plan at Para 2.667 states the following '*Development needs to be sensitive to retaining settlement and landscape character and pattern. This includes views towards the historic village core and church and across plateau landscape. There are opportunities for biodiversity enhancements related to the site's situation within the wider agricultural landscape*'. This has not been achieved by the proposed scheme.
- Landscape impacts and lack of any wider landscape mitigation for views (land is rising) of the development. Impacts on Key Views identified in the emerging WM Neighbourhood Plan have not been considered, these being 7, 9, 10, 12.
- Soft landscaping commitments were not carried out as per approved plans at the neighbouring development Wickham Place. This was in part due to SCC Highways reluctance to accept trees within five metres of highway boundaries and to the use of underground drainage structures which precluded the approved tree planting. Similar issues will arise in that planting indicated will again be left out of the scheme resulting in the development lacking greenery. This is **not** acceptable.
- The development does not comply with the emerging NP which describes the need to both protect and provide for wildlife and the use of native species within developments. The submitted Landscape Strategy Plan largely refers to non-native species. One of the two footpath connection points will involve cutting through a mature elm hedge (home to birds such as whitethroat and yellow hammer) rather than using existing gaps.
- Adverse visual impacts have been identified from identified Viewpoints 6 and 8 (submitted LVIA). There will be clear views of the development from Walnuts Lane and the Pettistree Conservation Area (CA) with the impacts affecting the setting of both the CA and the Wickham Market Cemetery.

HIGHWAY SAFETY

The highway infrastructure within Wickham Market is inadequate to cope with this development, and the traffic it will generate. Specific concerns are as follows:

- The road and pavement near Wickham Market Post Office is inadequate for safe pedestrian use with no plans for any improvement scheme.
- There is no safe walking route to Wickham Market Primary School, although the Parish Council wishes to point out that as a result of the Wickham Place development no new primary school age children were admitted to Wickham Market Primary School.

- The footway on the Eastern side of High Street (B1438) stops just north of Morris Road and subsequently, there is a need for pedestrians to cross the High Street in order to access any of the local amenities including the Primary School.
- The development would clearly impact upon the High Street, significantly increasing vehicular, pedestrian and cycle movements. Due to the narrow road and footways, there are congestion issues and highway safety concerns within this area. Increased traffic of possibly 450+ cars will clearly add to these issues and further impact the High Street.
- Many roads within Wickham Market have pinch points with speeding and hazardous driving occurring on a daily basis. The roads within the village would **not** be able to cope with possibly an additional 450+ vehicles along with the proposed traffic implications resulting from the development of the proposed Sizewell C Park & Ride site.
- Previous commitments to footway improvements secured by the S.278 agreement for Wickham Place do not appear to have been carried out and this is not acceptable.

POLICY SCLP 10.5: SETTLEMENT COALESCENCE

Development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements. Neighbourhood plans may include policies addressing local issues related to settlement coalescence.

It is felt these applications are not in line with the above mentioned policy as the development will create an urbanising effect between the two settlements.

The applications seek to increase the population of Wickham Market by at least 12.6% based on the 2011 census (this is only considering two adults per proposed household) but when considering the population within Pettistree this then rises to 140% (population of 194 in 2011).

The existing special quality of open countryside will be replaced by an urbanised approach to this historic village. The size of Wickham Market's Conservation Area and the number of listed buildings within it bears witness to its historic village character.

Wickham Market's entrance from the South will disappear resulting in loss of views of Wickham Market and its landmark Church Spire caused by the buildings on rising ground.

There will be obvious confusion amongst the new residents as to if they are part of Pettistree or Wickham Market and if this development is allowed there will be inevitable coalescence of the two settlements, especially if further development is granted following this one.

POLICY SCLP 11.7: ARCHAEOLOGY

An archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains. Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of the archive is more appropriate. Archaeological conditions or planning obligations will be imposed on consents as appropriate. Measures to disseminate and promote information about archaeological assets to the public will be supported.

The Archaeological remains/findings on this site have **not** been sufficiently evaluated. This is made clear in the comments from James Rolfe of the Archaeological Service within his correspondence dated 10.09.2020. Wickham Market Parish Council **insist** that a full independent Archaeological Study is carried out **ASAP** and the findings from this are reported back to the Parish Council via the Parish Clerk.

This should be carried out in accordance with the Local Plan which states at Para 12.668 that: *'This large site lies to the south of prehistoric and Roman sites excavated prior to development of land south of Featherbroom Gardens. It has not been subject to systematic archaeological investigation. Suffolk County Council have highlighted that archaeological assessment should be required to inform any planning application to ensure that proposals are sensitive to assets of archaeological interest'*.

POLICY SCLP 5.8: HOUSING MIX

Proposals for new housing development will be expected to deliver the housing needed for different groups in the community as identified in the Strategic Housing Market Assessment, or latest equivalent assessment.

New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 and 2 bedrooms). To contribute towards meeting the significant needs for housing for older people, proposals for ten or more dwellings should demonstrate how the development will contribute to meeting the needs of older people.

There are only five bungalows planned for the site and these are all sited at the Southern edge boundary making it a long way to walk to the Co-Op and village centre facilities for residents who are more than likely to be elderly. It is also noted there are no bungalows within the proposed affordable/social housing scheme either.

INFRASTRUCTURE

The existing infrastructure is **not** adequate to support the proposed development, as follows:-

- The existing sewage system would **not** be able to cope as this is already at full capacity and requires lorry drainage every week.
- Space for bin collection and bin storage points on the plan appears to have been largely overlooked and not adequately accommodated within the layout. Many bins will be left out on the roads and on fronts of properties thereby creating an unattractive appearance.
- Wickham Market Medical Centre does not have sufficient space or staffing to cope with the proposed new homes (resulting in around possibly 450+ people). It has no room to expand and it is felt that any expansion of the Medical Centre provided through funding is likely to take place at Rendlesham Surgery resulting in residents of Wickham Market having to travel further to attend a doctor's appointment. This is **not** acceptable.
- There is insufficient capacity at both local Secondary Schools as Farlingaye and Thomas Mills High Schools are both full and pupils are being sent to Leiston Academy.
- Surface water drainage is not adequately catered for. The plan to let areas flood when self-contained drainage is not sufficient will intrude on the existing Wickham Place development and could result in a marshy area with mosquitos, and a water hazard for children.
- Chapel Lane floods regularly following heavy rain, this problem has increased since Wickham Place was built and is worse during winter months. The development is likely to exacerbate this problem significantly.
- Play Areas - Distances and access to the Village Hall Playing field being by main road only result in the requirement for a Neighbourhood Equipped Area for Play (NEAP) on site (Ref SPG 15; Village Hall field is approx. 600m away); The layout does not conform to SPG 15 in respect to Play Space Allocation.
- Local Play Spaces i.e. at Wickham Place are not linked and therefore discourage social cohesion between children and families.
- Policy SCLP 8.2 states that new residential development will be expected to contribute to the provision of Open Space and Recreational facilities in order to benefit community health, well-being and green infrastructure.

- Library Services: Local Plan Policy 12.677 refers to Library provision but erroneously states that the site falls within the Woodbridge catchment.
There is no reference to Wickham Market library which is a functioning library but would not be able to expand in terms of services (the library was saved by local people when threatened with closure), lying as it does within the same area as the Medical Centre.
- The area where Hopkins Homes show the proposed huge drainage basins, as featured on their proposed plan, show the ditches are absolutely empty, however, the ditch does significantly fill with water the opposite end nearing the B1438 where Hopkins Homes propose to build Plot 1 and Plot 23.
- If footfall increases in Wickham Market then presumably disabled numbers increase possibly too. The footway between the development and Wickham Market is narrow and would force wheelchair users/disabled residents into the road.
- There is inadequate public transport. The last bus is at 7:00pm with no service on a Sunday.

OTHER OBJECTIONS

- Some of the comments within the questionnaire within the Design & Access Statement were factually incorrect.
- The consultation period for an application of this size and during these current times was unacceptable and should have definitely been longer.

CONCLUSION

Wickham Market Parish Council raise **STRONG OBJECTIONS** to **both** applications as stated above. If East Suffolk Council are minded to consider approving this scheme against **both** Pettistree and Wickham Market Parish Councils Strong Objections along with many local Objections raised then Wickham Market Parish Council would expect to see considerable input and negotiation taking place with Hopkins Homes to deal with the many issues as raised above.

The Parish Council would also like to point out that when Wickham Place was completed it became apparent that the gas had not been connected and this then resulted in a 6 week road closure through Wickham Market.

I trust that you will take the above comments into consideration.

Yours faithfully,

Cllr Lisa Sanders, M.A., M.Phil., M.CMI.

Chairman

Wickham Market Parish Council Planning Committee

c.c. Mr Philip Ridley, Head of ESC Planning

Cllr Carol Poulter, ESC

Cllr Alexander Nicoll, SCC