

Local Plan First Draft Consultation 14 September 2018

Hacheston Parish Council



Table of Contents

1. Hacheston	1
2. Context: Main developments in and for Hacheston.....	2
3. Hacheston engagement with Local Plan Consultation	2
4. HPC's Overall Response to Consultation.....	3
5. Local Plan First Draft	4
6. Summary	11

1. Hacheston

The village of Hacheston is situated on the B1116, 2 miles north of Wickham Market and 4 miles south of Framlingham. The village lies on the eastern boundary of the much physically larger parish of Hacheston which includes two settlements known as Lower Hacheston, immediately adjacent to the A12 / B1116 intersection, and the Glevering Hall Estate. The population of the parish is approximately 350 people and it has a tax base of 152 Band D houses.

The village has developed over the last millennium in a predominantly linear or ribbon fashion. It nestles discretely on the western slopes of the Ore valley and extends for some 1.5 miles along the B1116. The village and the majority of the parish lie within the Ore Valley Special Landscape Area, however other than the church tower little of the village is visible from the surrounding clay uplands.

Hacheston is a commuter village for work in Suffolk and beyond and is approximately 2.5 miles from the Wickham Market railway station at Campsea Ashe. There is also a small amount of employment within Hacheston itself due to a number of local businesses and there is a considerable self-employed contingent.

Everyone living in Hacheston needs to travel in order to work, shop, visit the doctor, pharmacy, supermarkets and other amenities. It does not have a pub, although the village hall has monthly bar nights. There is an extremely limited bus service running at different times on different days. There is a garden centre which contains a well-stocked 'farm shop', campsite and café. The Village Hall and Church are at the centre of village activity with active communities supporting them.

Hacheston Parish Council (herein after referred to as HPC) represents the whole parish with seven councillors.

2. Context: Main developments in and for Hacheston

It is important for Suffolk Coastal District Council (SCDC) to appreciate the importance of the context for Hacheston in relation to the Local Plan:

EDF Sizewell C Power Station

- Increase in traffic projected and therefore speeding.
- Possible Park & Ride.
- Increase in the use of back roads to circumvent the inevitable delays caused.
- Massive increase of HGVs on A12. EDF's A12 options are not sufficient.

Framlingham Developments

- 500 houses are identified in the Site Allocations DPD.
- This will increase traffic through Hacheston.

SSP9 (DC/16/3863 10 Houses)

- The Sites Allocations process legitimised this site without full public scrutiny.
- Not currently tied to any infrastructure development.
- Does not include affordable housing despite the clarity of SCDC Policy SSP9.
- Outline Planning Permission given 23/05/2017.

Power Plant (DC/17/3742)

- The Power Plant was approved by SCDC on 18/07/2018 despite vociferous and widespread local opposition. Hacheston seems to be the target of a number of unwelcome developments (e.g. this or the park and ride) its opposition to which appears consistently to be ignored.
- Concerns over the planning process and willingness to disregard material planning grounds.

HPC and residents are concerned about unwanted developments being foisted upon the village, especially those that are not tied to reasonable infrastructure that serves the needs of the community. Residents are finding it increasingly difficult to trust that the local planning authority has Hacheston's best interests at heart. There is increasing traffic and therefore speeding, with seemingly absolutely no remedy or ways supported by SCDC or SCC in which Hacheston can counter the trend.

3. Hacheston engagement with Local Plan Consultation

- **November 2015:** HPC responded to SCDC's Site Allocations Preferred Options Consultation (Development Plan Document).
- **September 2017:** A full meeting of the village was held to establish its development policy. A motion was put to a vote, carried by a large majority, for limited planned careful development that meets the needs of the community.
- **October 2017:** Local Plan Review Issues & Options Response.
- **July 2018:** Councillors attended SCDC Briefing 18/07/2018 on the First Draft of the Local Plan.

4. HPC's Overall Response to Consultation

The primary focus and concern of this consultation document is the provision of sites for potential housing development across the Suffolk Coastal District. HPC believes that the same level of focus and concern should be paid to identifying sites and schemes for infrastructure development in the areas of sustainable transport, health, welfare, education, employment and leisure. Recent development across the District has demonstrated that it is not acceptable to approve large housing developments and hope that the necessary infrastructure will appear.

The points HPC raised during the Site Allocations Preferred Options Consultation (Development Plan Document) November 2015 consultation were largely ignored but they are more relevant than ever:

- The status of completed or in-process Neighbourhood Plans of Framlingham, Wickham Market, Rendlesham, Saxmundham and Woodbridge is unclear as is the influence they will have on determining the level of development at these locations.
- The level of development being considered will have a major effect on Hacheston in terms of traffic (volume of commuters and HGVs, and speed) and access to health, welfare and leisure services.

Residents are concerned about:

- Removal of the Special Landscape Area which has been at least some form of protection to unwelcome development. Without the SLA and moving to a criteria-based system and given the planning authority's willingness to override some criteria in order to use others as a justification to allow unwelcome development, residents feel that there could be no protection at all.
- developments proposed in Hacheston without proper consideration of the infrastructure needed to support them.
- developments imposed upon residents despite universal opposition from residents.
- the impact of developments elsewhere on traffic and speeding through Hacheston.
- preserving heritage assets and the landscape, with its ecology.
- developments which counter stated policies, such as SSP9 (affordable housing), SSP38 (landscape) or breaking the current Physical Limits Boundary.
- changes to the physical limits boundary which may cause unwanted development.

In September 2017 Hacheston residents voted to have limited development supported by infrastructure which meets the needs of the village.

In conclusion:

- Hacheston residents and its Parish Council feel that their perspectives on development are not sufficiently taken into account.
- This must change. A realistic assessment of infrastructure issues needs to take place which takes account of the impact on Hacheston.
- We ask SCDC to retain the Special Landscape Area.

5. Local Plan First Draft

1. Hacheston has no allocated sites in the First Draft

- Allocations were proposed for four sites following a ‘Call for sites’ undertaken in 2016 and presented in the 2017 Issues and Options document (see 12.10 Site Allocations – page 177) These sites have not been carried through to the First Draft Local Plan.
- This is confirmed on the map for Hacheston in the separate Policies Maps document issued as part of the First Draft (see page 27 of the Policies Maps booklet). The Policy map for Hacheston contains no sites marked in yellow with SCLP allocation numbers as shown on Policy maps for other towns and villages.
- The map shows the SCLP3.4 Settlement Boundary for Hacheston and SSP9 (Site for 10 houses south of Solomon’s Rest) under Housing Permissions as at 31/03/2018. Boundaries have been maintained, with Settlement Boundaries (SB) replacing the former Physical Limits Boundaries (PLB). The Settlement Boundary now includes the SSP9 site which has been given outline Housing Permission.

2. Suffolk Coastal Spatial Strategy

- Housing development in Hacheston is outlined as follows:

Completions 2016 to 31/03/2018	2
Permissions at 31/3/2018	12
Existing allocations without permissions	0
Total to date	14
New Housing Allocations	0
Indicative contribution 2016 – 2036	14 (left chevron 0.5%).
- These figures are from “*Table 3.5: Anticipated Housing growth by Town/Parish 2016 – 2036*”, p45 of the First Draft within the Spatial Strategy section.
- Because the period under consideration is 2016 – 2036, the 10 houses given outline planning permission under SSP9 count within the total of 14. This is in line with Mark Edgerley’s view noted with councillors during a 1-to-1 session in October 2017.
- For a small village of 154 Band D average dwellings, 14 would be a reasonable figure to expect. This is commensurate with no further allocations having been made for Hacheston.

Hacheston believes this is reasonable level of development over the coming years and is content with the figures outlined.

3. Countryside

The area outside settlement boundaries is known as 'Countryside'. Within the Countryside, in rural areas there may be existing 'Clusters' of around 5 or more dwellings. Hacheston has a number of such 'Clusters'; e.g. the Old School and the houses adjacent to it; or Lower Hacheston.

Policy SCLP3.4: Settlement Boundaries (see page 46) states that:

"New residential ... development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise. Proposals for new residential development outside of the Settlement Boundaries will be strictly controlled in accordance with national planning policy guidelines and the strategy for the Countryside."

However, and there is always a 'however', Policy SCLP5.3 Housing Development in the Countryside (see page 80) states that:

"Affordable housing to meet identified local needs on exceptional sites adjacent to, or well placed related to Settlement Boundaries or clusters of housing"...

may be one of the exceptions permitted. 5.21 on the same page further states that:

"some locations where there are existing clusters of five or more dwellings may be suitable for a small amount of development."

This is important as the Strategy for Rural Areas (see page 250) states that:

"areas well related to the A12 or to Ipswich present greater opportunities for new development".

HPC believes that:

- (1) this must come as a result of identified local needs.
- (2) must be tied to relevant infrastructure to support any development, and in particular to enhance infrastructure already in place such as water delivery.
- (3) no "identified local needs" currently exist beyond sites already given Housing Permission (SSP9) and even with that an identified local need within the SSP9 policy for affordable housing has not been achieved.
- (4) HPC has great concerns about opportunities for development near the A12 due to the continually increasing traffic with its associated speeding problems.

4. Infill and Garden Development

A further exception to the 14 houses identified in the Spatial Strategy is 'Infill and Garden Development' within the Settlement Boundary.

(a) Policy SCLP5.7 Infill and Garden Development (see page 86) states that:

"Proposals for infill development or residential development within existing gardens will be supported" provided that:

- the scale, design and materials would not result in harm to the street scene or character of the area. HPC believes this is essential for the village to continue to exhibit a rural character and strongly supports this policy.
- the proposal is well related in scale and design to adjacent properties, including the design of curtilage areas, parking and access. HPC is concerned that developments do indeed relate well to existing structures, and that Hacheston does have an open character which it is desirable to preserve.
- there would not be harm to the residential amenity of occupants of either the existing or proposed dwellings. Some recent developments have caused such harm with houses built which are imposing and have affected the residential amenity of neighbours.
- existing and proposed dwellings have sufficient curtilage space. Some houses recently built do not have enough curtilage and are too close to neighbouring properties.
- the proposals are in accordance with the housing policies of the Local Plan. Residents feel that some refusals should have been made on the basis of Local Plan policies where permission has been granted, and that the views expressed by the HPC are not given enough weight.

(b) Policy SCLP5.8 Housing Mix (see page 90) states that:

"proposals for 5 or more units should provide for a mix of sizes and types ... and should provide for at least 40% of 1 or 2 bed properties."

HPC would like to see this mix be applied to the site already given outline planning permission (SSP9) in the context of any further more detailed planning application, and to see this 40% rule applied in the context of affordable housing already specified within the SSP9 policy.

5. Ageing Population

At the 18 July SCDC briefing that four HPC Councillors attended, Cllr Tony Fryatt stressed that Suffolk Coastal has an “ageing population” and the Local Plan needs to take account of this. Section 11.2 (see page 158) states that:

“It is therefore important the design of the built environment caters for people throughout their lifetime and is suitable and accessible for people regardless of age, mobility or disability. This policy establishes the criteria against which residential developments will be considered, to provide for the needs of the most vulnerable in our society.”

- (a) This reflects the view expressed by some residents at the meeting held on 25/09/2017.
- (b) Consideration should be given to those wishing to downsize but remain within the village.
- (c) Bungalows and other single-storey dwellings are thus important as, being on one level, they are suitable for adaption for wheelchair access and for those with mobility problems.
- (d) Hacheston has a number of bungalows within the settlement boundary. It is important that these are retained as part of the housing stock of the village, and that any proposals for Garden Development within the gardens of bungalows within the settlement boundary should be limited to bungalows or single-storey dwellings.

This would:

- extend the provision for older/disabled people within the settlement boundary and
 - avoid existing single-storey buildings being overlooked in such a way as to affect the privacy of the existing occupants.
- (e) It is also of great importance that weight is given to developments which are on main bus routes. For example, a site put forward in the Issues & Options consultation in Lower Hacheston might have been suitable as it comprised 5 houses and thus matches the housing mix noted above as well as a policy for development in mind of an ageing population – it is also on the main bus route from Ipswich to Aldeburgh.

This could be held in reserve should any proposals be put forward by developers for new development adjacent to a cluster of around 5 dwellings in the Countryside or within the Settlement Boundary.

6. Water resources

There have been recent representations from residents to HPC about problems with the mains water supply to the settlement boundary area of the village. Problems with water supply are mentioned at several points throughout the Local Plan.

On page 129, for example, it is stated that “Anglian Water have identified East Anglia as an area of ‘severe water stress’”

On page 53 under Infrastructure it is stated that development “will not be permitted where it would have a significant effect on the capacity of existing water infrastructure”.

There needs to be upgraded water supply network infrastructure to cope with ongoing proposed development and indeed any further developments in Hacheston will require this.

7. A12 Corridor

The A12 Corridor north of Ipswich up to Saxmundham is identified as a significant growth area within the Local Plan. This includes Martlesham, Woodbridge, Framlingham, Saxmundham and Leiston. The A12 is identified as having existing “pinch points” where traffic is held up:

- Seven Hills roundabout.
- Martlesham with the roundabouts to the BT campus, out-of-town shopping area, and now the 2,000 home Brightwell Lakes development.
- the single-lane section of road between the Fynn Valley and Woodbridge by-pass dual carriageways.

An occasional reference is made to Sizewell C and the associated Park and Ride, but absolutely nothing is said about the major traffic “pinch point” that this would create for the A12. Nothing is said about the access roads and the roundabout leading to the Park and Ride site.

There is continuing concern about the enormous impact that the Park and Ride site would have on Hacheston and surrounding villages.

8. Transport

(a) Section 7 (see page 114) identifies that the District:

- has a high reliance on cars: 86% compared with the national average of 74%.
- Many areas have no access to public transport and are served by narrow local roads.
- 44% across the District use a car to travel to work whereas the national average 37%.

Section 7.5 states that the Travel Plan 2011-13 sought to provide efficient use of transport networks and to improve the infrastructure.

(b) In relation to Hacheston:

- the B1116 through Hacheston has seen no sign of any improvement and the volume and speed of traffic through the village remains of great concern to both HPC and residents.
- If Sizewell C and its Park and Ride go ahead, this will only have a negative impact.

(c) Policy SCLP 7.1 Development states (page 114) that:

“The cumulative impact of new development will not create adverse impacts on the existing transport network”.

This is unlikely to be true. In the case of the large developments approved for Framlingham and currently under construction, adverse impacts are already being keenly felt and traffic will only continue to increase through the village once all the new homes are completed and occupied.

Future developments of 80 or more dwellings, or when considered cumulatively with other developments, will require Travel Plans when they are “likely to have an adverse impact on

the local community or local road network.” For Hacheston this is regarded by HPC as “closing the gate after the horse has bolted” as the traffic and speeding problems have been made clear to the District and County Councils on numerous occasions.

Approximately 50 living units are likely to come forward in the later stages of the Local Plan. It is noted in respect of Framlingham (see page 233) that:

“it is not considered necessary for the Local Plan to allocate further development. Growth in Framlingham to 2031 is already planned for, so it is not anticipated that any future growth will come forward until past 2031.”

(d) Section 12.180 notes that

“a significant increase in infrastructure is required to ensure that the town continues to thrive.”

A significant increase in infrastructure is very much supported by HPC.

(e) Railway Transport

- Railways are hardly mentioned in the Local Plan and this is significant. Only the Felixstowe branch gets any real mention (see page 180) because of the freight traffic. The East Suffolk line is ignored (except the inclusion of a photo of Woodbridge railway station.)
- If Sizewell C goes ahead, the East Suffolk Railway line is vital to keep as much HGV traffic off the A12 and local roads as possible. To achieve this, the passing loop at Campsea Ashe station is absolutely essential. Although Councillor Fryatt noted that transport is a County Council matter, SCDC must make at least some statement about how development of the non-road transport network is essential for the well-being of residents in the District who live along the A12 north of Ipswich.
- Whether or not Sizewell C goes ahead, the passing loop at Campsea Ashe is vital to increase the frequency of trains to cope with the planned developments at Saxmundham, Leiston, Framlingham and Woodbridge. At present, passenger services are limited to one train per hour in each direction between Saxmundham and Ipswich which is not sufficient to cope with the proposed development outlined in the Local Plan.
- Putting more and more cars and HGVs onto the A12 in this corridor is unsustainable. The ability to find parking spaces in towns and better public transport, especially railways, is essential.

9. Landscape Character

HPC is concerned that the SCLP 10.3: Landscape Character Policy dispenses with the designation Special Landscape Area. The Policy incorporates the Suffolk Coastal Landscape Character Assessment based on criteria which contends that “all landscapes matter, not just those that are designated”. SCDC officers have confirmed this change of approach.

This may have advantages as well as disadvantages, areas that previously were not part of a Special Landscape Area could be afforded the same level of protection as those that were. But SLA landscapes may lose the protection previously afforded to them, and become less special. The problem is that criteria tend to be rather vague and subjective and can be interpreted and reinterpreted to arrive at the desired outcome for a proposed development rather than an outcome which genuinely protects the area in question. It requires that parishes and all those that enter the planning system would need a high degree of trust that officers and councillors really will apply criteria appropriately

In the Appendix alternative options are outlined including an admission that to “update Special Landscape Areaswould require categorically and robustly delineating boundaries. This is challenging in terms of consistency with up to date evidence and current national policy ...” Since this would be costly and time consuming and Government guidance is against locally defined designations we conclude that there will be no SLAs in future.

The landscape in which our parishes sit is special and it is our responsibility to ensure that it is protected for the future despite the pressure of residential and infrastructure development. Without the SLA designation we will rely on a Draft Landscape Policy which states that:

“proposals will be expected to demonstrate that their location, scale, form, design and materials will protect and where possible enhance.....” .

The policy should state that no development will be permitted unless the landscape is unharmed or suffers minimal harm, or perhaps the character of the landscape is unharmed.

The question as to the balancing exercise to be undertaken in relation to other objectives, such as green energy infrastructure then becomes key. Currently the policy as set out seems to allow for any green infrastructure despite its impact on the landscape, unless it has a significant adverse impact. HPC was disappointed recently that the application to build a power plant in the parish was approved and neither landscape nor heritage designations carried much weight.

6. Summary

The First Draft is correct in its assessment that “housing in the countryside can have impacts upon the landscape and natural environment.” (section 5.17, see page 79)

It acknowledges that:

“it is therefore important that the Local Plan achieves the correct balance between supporting some development that can help to sustain rural communities while not resulting in harm to the environment and undermining the reason for which people choose to live in and visit the District”.

HPC supports this statement and is keen that if this is incorporated into policy that the SCDC uses it in practice to prevent harm caused by developments such as an EDF SZC Park & Ride, houses being developed too close to a water course, structures being erected which are not in keeping with surrounding dwellings, or developments in areas which currently are protected by Special Landscape considerations.

Allowing the development of the 14 dwellings already constructed, under construction or having planning permission for the period 2016 – 2036 for Hacheston seems to be reasonable: it is an increase of 9% on current the Band D average of 154 houses.

Further developments within this period should be resisted, and SCDC should insist on relevant infrastructure being developed where policies indicate that some developments could go ahead. Essential infrastructure improvements are needed to cope with developments that we already have.

14 September 2018

Signed for and on behalf of Hacheston Parish Council

Councillors David Clough; Graeme Hall; Chris Hurlock; Oliver Hurlock; Terry Mee; Adrian Revill

Councillor Graeme Hall
Chairman
Hacheston Parish Council

Bartholomew Hall
Clerk and Responsible Financial Officer
Hacheston Parish Council