

MINUTES OF THE VIRTUAL MEETING OF WOOLPIT PARISH COUNCIL HELD ON WEDNESDAY 16 DECEMBER 2020 AT 7.30 P.M.

Present: Mr Guyler, Mrs Ewans, Mr Wheatley, Dr Geake, Mrs Moore, Mrs Jenkins and 1 member of the public.

1. Apologies for absence

These were received from Mr Aldis, Mr Howard and Mr Hardiman.

2. Public comment

Mr Guyler read out the part of the response to MSDC on the JLP from a resident so his points could be considered in WPC response..

3. To consider a response to the Babergh and Mid Suffolk Pre-submission Joint Local Plan (Regulation 19) consultation and take any necessary action.

Mr Guyler, Mrs Ewans and Dr Geake have drafted a response which was considered by Cllrs. After discussion the response was agreed as below:

Policy LP25 - Sustainable Construction and Design

Homes in our district should be future-proofed, to the standards described in NPPF para 148. This states that ‘the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.’

The current LP25 goes some way towards reducing greenhouse gas emissions, but in order to meet the objective of ‘radical reductions’ stronger policies are needed. Appropriate changes might include the following:

1. Build new homes to Future Homes Standard, which includes a ban on new gas or oil central heating; this would need changes to 3a.
2. On water use, 3b, a standard of 110 litres per person per day is not ambitious enough. As many developments are now averaging 100 litres per person per day, a more appropriate target would be a maximum of 95 litres per person per day.
3. Building materials, 3f, the words ‘low embodied carbon’ should be changed to ‘low embodied energy’ as it would be a pity if structures made of wood, a traditional building material of Suffolk for centuries and a good way of sequestering carbon, were discouraged.
4. We should acknowledge that the re-use and refurbishment of existing buildings is almost always preferable to demolition and replacement, due to the embodied energy in existing structures and materials. At present this does not seem to feature in LP25 at all.
5. Extend ‘consequential improvements’ requirements for extensions (to ensure a larger building does not have a larger carbon footprint) to all buildings, including dwellings and those under 1000 sq. m. At present this does not seem to feature in LP25 at all.
6. Consideration should be given to a requirement for the design of homes to incorporate live/work spaces, to reduce the need to commute.

Housing Sites

LA094 – Land South of Old Stowmarket Road, Woolpit

Support

This site is under construction and provides an essential car park for Woolpit Health Centre.

Contiguous to LA094 is a site at the rear of Woolpit School for the provision of 40 houses, an extension to the School, and a rear entrance to the School which would provide safer access for pupils and vehicles. This site is currently the subject of outline planning application 19/02656 which is supported by Woolpit Parish Council.

The site would provide a safe walking route to the School from the new Health Centre car park which will be used for children pick up and drop off.

This site should be given an **LA** allocation number and included in the JLP.

LA097 - Land west of Heath Road, Woolpit

Object

Most of the traffic generated would have to pass by the school and Health Centre along the already congested Heath Road which is an HGV route. The site is beyond normal walking distance to the village centre and residents would generally use their cars to access local shops and services.

Business Sites

LA120 - Lawn Farm, Woolpit Business Park

Object

Summary: Woolpit Parish Council objects to the extension of Lawn Farm business park. It would be detrimental to the setting of listed buildings, create an unacceptable amount of traffic on narrow rural roads and will result in many lengthy journeys to work. New employment areas should be located near centres of population which have public transport available.

Detail: Woolpit Parish Council objection to Lawn Farm business park extension.

This industrial site will be immediately adjacent to the grade 2 listed properties of Lawn Farmhouse and Lawn Cottage and will be severely detrimental to their setting.

This site at Lawn Farm is currently under development. Although technically within the parish boundary the site is completely cut off from the village by the A14 with no means of access other than by car. Save for the access to the site from the eastbound A14, the site is only accessible to local villages over minor roads with no footpaths and thus does not meet the draft JLP's sustainability criteria. The employment numbers for this site are not known. The buildings will probably be distribution warehouses and not centres of manufacturing and employment.

It will not be possible to control the travel routes of those who will work at the site and many will pass through the already narrow congested Heath Road by the School and Health Centre, particularly when heading towards Bury on the A14.

Suffolk is a rural county. This proposal will add to the urbanisation of farmland alongside the A14 and contribute to the feel of driving through a ribbon of development. Industrial development should be confined to designated areas near the major towns.

Woolpit is already the fourth largest centre of commercial development in Mid Suffolk and its proximity to the A14 encourages workers to travel large distances to work. New employment areas should be located near centres of population with public transport and lower travel-to-work distances.

The proposals are in contravention of the previous Local Plan policy E10 which stated that industrial and commercial development in the countryside will not be permitted unless an overriding need can be demonstrated and set against the impacts including traffic generation.

Policies

Policy SP08 - Infrastructure Provision

Object

A secondary school should not be built in Woolpit. A new primary school should be built in Elmswell so that it will not be necessary to bus children from Elmswell to Woolpit. Addition parking should be provided at railway stations.

1. The Babergh and Mid Suffolk Infrastructure Delivery Plan (2019 – 2036), which forms part of the Strategic evidence base of the Joint Local Plan, states in section 3.6.5 on Secondary Education that:

The County and District Councils will also seek opportunities for the establishment of a new school along the A14 corridor, to be determined through the next Local Plan.

An 'area of search' has been identified as the parishes of:

- o - Woolpit and Elmswell

- - *Needham Market (including relevant areas of Creeting St Mary, Badley, Darmsden and Barking adjacent to Needham Market)*
- - *Bramford and Sproughton*

There is no allocated site in Woolpit for a Secondary school and there is nothing suitable available. No provision has been made in the emerging Woolpit NP for a Secondary school. No reference to a Secondary school in Woolpit should appear in the Joint Local Plan or its associated documents.

2. In table 8, New Primary Schools, the Infrastructure Delivery Plan states that there will be a need in *Woolpit for 'a new primary to supply growth of Elmswell and Woolpit'*.

As no new primary school is envisaged for Elmswell, and the existing school has only room to expand to 420, which is only large enough to accommodate children from the sites which already have outline planning permission, it is clear that the surplus children will have to be educated in Woolpit. This is unacceptable. There is no safe walking or cycling route between the two villages. The arrangement will lead to more traffic in both Woolpit and Elmswell and be detrimental to the wellbeing of the children, particularly of this age group. The creation of an additional primary school in Woolpit could lead to social divide within the local community. A new primary school must be built in Elmswell.

The provision of primary education for the existing population and new homes in Woolpit can be achieved by extending the existing school on land available adjoining the site, as described by SCC's Growth, Highways and Infrastructure team in its consultation response to Mid Suffolk planning application 19/02656 for 40 houses at the rear of the school. Such an extension would even be adequate if all the houses proposed by the JLP were built.

3. Paragraph 104 of the NPPF states that, in relation to education facilities, planning policies should minimise the number and length of journeys. Early years settings and schools will therefore aim to be placed in the best possible location to promote sustainable modes of travel and enable good access.

4. In Woolpit, Thurston and Elmswell hundreds of new houses are being built. The railway stations at Thurston and Elmswell villages are on the main line to Stowmarket, Bury St Edmunds, Ely and Cambridge, yet there are just a dozen car spaces at Thurston station and six at Elmswell. More people and cars are forced to use an already crowded A14. Provision of more car parking at stations must be included in the JLP.

Policy SP04 - Housing Spatial Distribution

Object

The allocation of 717 new homes will double the size of Woolpit's core and overwhelm the village. Mid Suffolk has not justified its strategy on housing distribution and has ignored the wishes of Woolpit residents as established in the consultation for the Woolpit Neighbourhood Plan. The proportion of housing allocated to the Core Centres should be reduced and more given to hinterland villages to create greater viability in remoter rural communities. The emphasis on new housing adjacent to the A14 will encourage long distance commuting to Cambridge and Ipswich. A new settlement for Mid Suffolk is required at the outset of the JLP.

1. The 717 homes allocated to Woolpit is excessive and will result in the village core doubling in size. Woolpit will be overwhelmed by such growth and the village will be turned into a town. No justification is provided for 38% of the total housing in Mid Suffolk coming from the 13 Core Villages and only 10% from 44 hinterland villages, many of which have expressed a wish for more houses. Many also have a good connection to a main road and some of the facilities which define a core village. Furthermore, the August 2017 consultation defined the 'Transport Corridor' option as including 'communities

within approximately 2km of an A road junction' and did not confine future development to the core villages. It is difficult to understand therefore why the only A roads included are the A14 and A140 – not the A143, A1088 or A1120.

2. Paragraph 9.6 under Spacial Distribution states that 'it is important that all communities throughout the area are helped to maintain vitality and services.' By concentrating new housing in the A14 corridor and in core villages, the JLP fails in this objective and does not spread new housing around the area. It thereby deprives hinterland villages of the opportunity to encourage young families to settle and maintain community viability.
3. Although Woolpit has considerable employment land, the number of new homes proposed and the proximity to the A14 will result in many people moving here simply because it provides a straightforward, but often lengthy, commute to Cambridge, Ipswich and Bury St Edmunds. The provision of these houses in Woolpit will result in many long journeys to work which could be much reduced by building nearer the major centres of employment. Given a major road and houses which are more affordable by Cambridge standards, commuters are prepared to travel long distances to work from Mid Suffolk. This Joint Local Plan should not be encouraging such unsustainable travel.
4. Woolpit is unfortunate to be overburdened with new housing because Mid Suffolk have been unable to resist the easy opportunity to include a 500 home site which will dominate the village. Greater efforts in seeking smaller, more suitable, sites in Woolpit and elsewhere would have produced a less disastrous result.
5. A new settlement is required as a priority at the outset of the JLP in order to reduce the housing pressure on core centres. Leaving it 'for future consideration' is unnecessary and leads to distorted spacial distribution. The best solution has been ignored because of an easier option.

Housing Sites

Woolpit

At Page 44, **Woolpit** is identified as a 'Core Village' required to provide 717 new homes by 2036. Only 18 units are Identified as having outstanding planning permissions (OPPs) as at 01.04.18. This is very misleading. By the time the Plan is adopted it will be more than three years after 01.4.18 and Woolpit currently has a great deal of construction underway. The draft plan should be brought up to date now or it will be out of date and will need further review as soon as it is published. Specific new development locations are identified on the Policies Maps at the end of the document, where at Page 500 development sites for Woolpit are listed. Two large sites identified are already under construction **LA093** -49 homes and **LA094** – 120 homes. There are a considerable number of, what the draft JLP calls 'windfall sites.' of one or two houses probably bringing the total above 200. The draft JLP completely ignores a further site adjacent to LA094 for a further 40 homes. Whilst there are some objections to the development of this site it is, on the whole, supported by the village. Together with LA094 this site brings much needed infrastructure gains which benefit both the new houses and the existing village in the form of a car park for the health centre and land for a school extension.

LA095

Object

Land north east of The Street, Woolpit is proposed as a site for 500 houses. This site is better known as the land East of Bury Road. Outline planning permission over part of this site for 300 houses, was allowed in February 2020 with the formalities completed in August. In respect of this site the MSDC has treated the draft JLP as if it had been adopted. The granting of this permission is currently subject to Judicial

Review. The claimant for Judicial Review is a private resident in the village whose action is supported both morally and financially by villagers. The claimant is writing to the inspector separately.

Para 09.08 states that ‘the new development locations have been identified with consideration to consultation responses, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area (e.g. flood zones, heritage features and landscape designations etc) and the infrastructure capacity and opportunities (e.g. schools and healthcare etc). Sites judged to perform best overall against the above criteria and evidence base outcomes have been proposed in this document’.

Does Site LA095 meet the criteria set out in Para 09.08? WPC thinks that it does not.

1. consideration to consultation responses,

The residents were consulted as part of the Neighbourhood Planning process and rejected building on this site. Thus, the draft JLP has been given undue precedence over the existing local plan and the emerging Neighbourhood Plan.

It is stated at Para 01.19 ‘The Plan will have regard to emerging neighbourhood plans being prepared in the District and will provide a context for new neighbourhood plans to be prepared against’. The experience of Woolpit is that this is simply not true. To get a Neighbourhood Plan adopted the housing numbers and sites in the draft JLP must be accepted (or at least not opposed). The Neighbourhood Plan has no input into the JLP yet the JLP dictates the content of the NP whether or not it reflects the local wishes.

2. the availability and deliverability of sites,

this site is available being owned by people who do not live in the village, are not interested in farming the land and have entered into an option agreement with a developer. This leads to the conclusion that the inclusion of this site is developer led and not plan led. As to deliverability, the developer argues this is an expensive site to build because of infrastructure. The site may be well down its start list. It has persuaded MSDC that it cannot afford to build the expected proportion of affordable homes. Although this is a most important planning consideration the figures are not made public. Outline planning for 300 homes has been granted and we can expect an application for a further 200 in part to mitigate the infrastructure costs. This will be over and above the target figure for the village.

3. the preferred spatial distribution pattern,

The site is adjacent to the A14 which is the MSDC’s preferred development corridor but without extensive and expensive highway infrastructure work development will not be possible as the existing village roads are already congested. The developer has already argued that the cost of this development is high.

Also, do people wish to live immediately beside this busy national route?

Human nature being what it is, new residents will use only their cars for transport.

4. the sensitivities and constraints of the area (e.g. flood zones, heritage features and landscape designations etc)

The development will overwhelm the existing village. The medieval core and the conservation area cannot take more traffic, the footpaths are narrow. With something like 250 houses already in the pipeline the village core is expanding by more than 35%. If the total of 717 houses are to be built in Woolpit the village core will have doubled in size and will have taken more than 5.7% of the growth required in the district. Even allowing for Core villages to grow more than hamlets this appears to be an unreasonable burden.

5. the infrastructure capacity and opportunities

5.1 Development conditions for this site include

5.1.1 a school site which Woolpit does not need. The existing school has spare capacity and as referred to above, there is a plan to extend it if needed. The new school places are needed in Elmswell where considerable development is also taking place but where MSDC has not secured school provision. Whilst there are some children from each parish

who attend school in the other this is not a reason to bus and car a whole cohort of children to Woolpit.

5.1.2 New roads and roundabouts are required for this site. They will serve only this site and make no contribution to resolving the existing traffic problems of the village. Whilst there are words in the draft JLP requiring contributions to the cost of providing buses, cycle paths and footpaths, the actual cost is much greater. For example, if land can be acquired to complete the route of a foot/cycle path to Elmswell railway station the cost will run into millions.

5.2. The third paragraph of the introduction to the draft JLP says *'We must ensure our districts' environment is protected and enhanced, focussing on combatting climate change and achieving biodiversity net gain. Our Councils have an ambition to be carbon neutral by 2030 and continue to encourage sustainable transport, including more cycling and walking. The Plan also seeks to help strengthen the local economy by encouraging the development of business growth and inward investment – revitalising our town centres and offering opportunities for tourism'.*

The district council has not applied these standards to Woolpit, the car will remain the main form of transport. In fact, the emphasis on the A14 corridor for development makes the carbon neutral ambition unobtainable. As for biodiversity gain, all the proposals consume open farmland. Most new residents will leave the village by car to commute to employment and shopping elsewhere. The historic village centre will be not be revitalised in a sustained manner, if revitalised at all.

4. Date and time of the next virtual Parish Council meeting – Monday 4 January 2021 at 7.30 p.m. Noted.

The meeting closed at 8.40 p.m.

Signed.....

Dated.....