

Suffolk Coastal Local Plan - Final Draft

View Comment

Comment Information

Document Section	Final Draft Local Plan 12 Strategy for the Rural Areas Land West of Chapel Road, Grundisbu... Policy SCLP12.52: Land to the West of...
Comment ID	104
Respondent	Grundisburgh & Culpho Parish C...
Response Date	12 Feb 2019
Do you consider that this part of the Plan meets the legal and procedural requirements?	
Do you consider this part of the Plan has met the tests of soundness?	No
Do you consider this part of the Plan to be unsound because it's not:	Positively prepared, Justified, Effective, Consistent with national policy
Details of Representation	The Plan fails to meet the legal and procedural requirements

1. The site was selected by SCDC as the 'preferred' site in the Final Draft Local Plan **without the necessary prior public consultation** to fully assess its suitability – as mandated by both national and district planning policy and attested to by Grundisburgh Parish Council.
2. SCDC has upgraded the site from "unsuitable" (SHLAA 2014) to "potentially suitable"(First Draft Local Plan July 2018, Appendix I, page 79) to "preferred" (Final Draft Local Plan Jan 2019) **without the necessary supporting evidence** from the proper consultation bodies – as mandated by district and national planning policy.
3. The 'small print' mention of Chapel Field as "potentially suitable" in Appendix I of the First Draft Local Plan July 2018 refers to a site size and boundary that differs to that entered into the Final Draft Local Plan Jan 2019, thus rendering any

lack of objection to the site's upgraded status as irrelevant due to it being a **fundamentally different proposition**.

• Additionally, Policy SCLP 12.52 "Land West of Chapel Road, Grundisburgh" **fails to meet tests of soundness because: it was not positively prepared** through lack of consultation with the local community and the Parish Council as above.

Additionally, Policy SCLP 12.52 "Land West of Chapel Road, Grundisburgh" **fails to meet tests of soundness as it is not justified and is inconsistent with national planning policy**.

Over 50 years' worth of Local Authority planning decisions for the location and its immediate surroundings, on public record, indicate that the site is **unsuitable for major development**. Reasons cited are numerous but most significant is poor highways access and potential hazards due to narrow lanes without pedestrian footways – in contravention of numerous national planning policy guidelines.

In the National Planning Policy Framework 2018

Considering Development Proposals

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

1. b) safe and suitable access to the site can be achieved for all users; and
2. 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.

para 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. **(In the case of Chapel Field all the evidence of past decisions and the experience of residents today shows that the road network in the area cannot secure safe access and egress from the site to the wider road network.)**

para 110. Within this context, applications for development should:

1. a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;

2. c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles,
3. d) allow for the efficient delivery of goods, and access by service and emergency vehicles;

Additionally, Policy SCLP 12.52 “Land West of Chapel Road, Grundisburgh” **fails to meet tests of soundness and is not justified or effective in that**

The site requires extension of Grundisburgh’s settlement boundary into the countryside, damaging the area’s natural environment and landscape character **without sufficient evidence that encroachment on such a scale is necessary** and considering sites are available within the existing Physical Limits Boundary of Grundisburgh and other villages.

The proposal indicates potential for 70+ dwellings which is **well beyond justifiable local need** considering Grundisburgh currently has only ~657 dwellings, few local employment opportunities; no shortage of housing to buy or rent at any time and notable shortcomings regards sustainable development potential.

In the National Planning Policy Framework 2018

Rural housing

para 77. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

Grundisburgh was allocated no residential development in the last Local Plan.

Since 2010 45 properties have been built on windfall sites and a further 7 have received planning permission in 2018.

Though the mix of properties is important parishioners consider the balance between size and tenure of properties is vital. Grundisburgh is unusual in the district in that, thanks to the hard work of the Parish Council, there is a reasonable mix of housing types and tenure.

Of the 657 dwellings in Grundisburgh 20% are Housing Association rented or shared equity and a third of those are reserved for local people. Of that total 13 are flats and 251 are bungalows. So 40% of the housing stock is bungalows and flats.

In the Suffolk Coastal Landscape Character Assessment Final Report July 2018 Alison Farmer Report Page 42 it states that

'Grundisburgh is the key focus in the valley and is a large bustling village arranged around its large central Green. Bounded by the church and school to the north, the Green is the main open space in the village and has a small river flowing through it, spanned by two fords and two bridges. Despite some extensive 20th century additions, the village retains a very attractive and traditional appearance and atmosphere, as reasonably good relationships to green space have been maintained next to new development in this area. The green spaces of the valley floor, and the spacious, treed grounds of large properties provide a distinctive approach to the village on its north and east sides.'

The valuable historic village centre is feeling the pressure of increased traffic. Parking issues are arising around the shop, pub and village green with the hazard of manoeuvring cars and delivery vehicles in an extremely confined space increasing. The egress from Meeting Lane at the central crossroads is difficult with almost nil visibility in each direction without the addition of the amount of traffic 70+ dwellings would produce.

Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound

Remove SCLP Policy 12.52 'Land West of Chapel Road'

Do not approve SCLP Policy 12.52 'Land West of Chapel Road' unless the site comfortably passes a comprehensive assessment of its suitability for development – with proper input from both relevant consultation bodies, residents, the Parish Council and with the full evidence base published for transparency.

Attachments

If your representation is seeking a change, do you consider it necessary to participate in the public examination?

Yes, I wish to participate at the oral examination

If you wish to participate in the public examination, please outline why you consider it to be necessary:

The Parish Council has a deep understanding about the locale, the limitations and likely impacts that local residents will feel should the plan be adopted. The Parish Council considers that more small developments and infill in small and larger villages within the District will help to create more sustainable communities rather than needlessly damaging the vitality and character of our historic village and surroundings.

Being kept informed

Yes, I would like to be kept informed