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Mid Suffolk Joint Local Plan

1. Introduction.

i. The Mid Suffolk District Council has produced a first draft of their Local Plan (referred to as JLP) in respect of which comments are required to be submitted by 30th September 2019.

ii. The District Council is elected by the inhabitants of the towns and villages within its district. It is their interests which should be paramount.

iii. It owes no obligation to those who seek to develop land within the District to their own and often financial advantage, other than to comply with the prevailing National planning legislation. The landowners do not "*own the land*" they only hold it "*in trust for future generations*".

iv. We do not recall any land owner or developer attending to defend or support their application at any of the public meetings organised by the Parish Council.

v. Equally the District Council must be shown to be acting in an open and fair manner especially by arranging early and thorough consultation with the communities likely to be affected by their decisions and those of their employees.

vi. It follows that the Council and their employees must **not** have private meetings with developers nor give them assurances that their schemes are likely to be supported by the Council and its Planning department, before the local community through its Parish Council has been made aware of such meetings and of the advice that the employees of the Council have or are likely to give, so that the Parish Council may make the necessary representations on behalf of the inhabitants of their parish before the Planning department staff give assurances in writing to developers.

vii. The District Council has shown that it meets the criteria for the presumption being in favour of the Council for sustainable development as it has now a 5 year

land supply. Employees of the Council must reflect this in their decisions and not act contrary to the stated position of the Council.

viii. Employees, especially those in the Planning department, should ensure that councillors representing wards where there are sites about which advice has been sought by landowners or developers, are alerted immediately in respect of advice likely to be given by employees in the Planning Department in respect of such land.

ix. The various departments of the Council are expected to act in an efficient manner and ensure that mistakes are corrected immediately they come to the light. The necessary financial support must be given to correct such mistakes, including seeking legal advice.

x. Before development starts in the form of houses being built, the District Council must ensure that the necessary infrastructure is in place.

2. The Joint Local Plan - JLP

i. There are a number of aspects of the plan upon which we wish to comment.

ii. In JLP 01.11, the Plan says that it seeks to protect the District's valuable natural resources. In the context of Woolpit that means the countryside that surrounds the village on four sides which is all prime agricultural land and the views of and from the village from its elevated position and the historic centre therein. The Mid Suffolk District Council have been in possession of the Woolpit Neighbourhood - Land Appraisal Report prepared by Alison Farmer Associates of Cambridge since March 2018 but make no mention of any of the recommendations in the Report in their plans for the village of Woolpit

iii. As the local government structure presently stands, the preservation of valuable natural resources by the Council is virtually impossible. For example the Plan does not explain how it will seek to prevent the building of developments on prime agricultural land.

iv. In JLP 01.14 the Plan seeks to coordinate the delivery of the necessary infrastructure. But there are no proposals for ensuring that a developer pays for and builds this infrastructure ahead of any housing development. The developer will only be interested in building houses for sale and if he has to pay a premium to the council to pay for such infrastructure, he will simply add this to the cost of the individual houses. He is not interested in building the necessary schools, car parks, shops or paying for the bus services. Yet the problem is that the authorities presently responsible for paying for such infrastructure, simply do not have the money themselves to pay for the same.

3. Vision and Objectives

i. Two recent examples from outside Woolpit, illustrate the failure of the District Council to provide this infrastructure.

ii. In Thurston and Elmswell hundreds of new houses have already been built and more are to follow (Thurston 1,468 new houses and in Elmswell new houses 834) Both villages are on the main railway line to Stowmarket, Bury St Edmunds, Ely and Cambridge, yet there still just a dozen car spaces at Thurston station and six at Elmswell station. No effort has been made to find more car parking at either station for the growing population that has been forced on these two villages. Instead more people and cars are forced to use an already crowded trunk road, namely the A14. The majority of the people seeking to live in these developments, will be seeking employment in these major towns and will resort to using their cars on the already crowded A14 instead of the regular and frequent train services.

iii. In JLP 03.3 (1) the Plan seeks to provide the “*right types of house*”. In contrast, all the developers who have sought recently to obtain permission to build on sites surrounding the village, have produced coloured publicity brochures which illustrate urban style houses which do not reflect any local features.

iv. On one large development, the builders claimed that they supported solar panels being fitted to the roofs of their houses until a man in the village pointed out that all the roofs faced north and that in the northern hemisphere the sun is in the south. The developer was somewhat taken aback when so informed.

v. An example of the lack of care for the environment by the staff of the District Council was the promise they made to support a development on the Old Allotments Site south of Rags Lane, Woolpit (DC/19/02688) where the exit from the site would have required the destruction of half of an ancient hedgerow, to provide visibility for cars leaving the site. None of this was mentioned in the planning officer’s “*confidential advice*” as being contrary to the stated policy of the Council. We suspect that the officer concerned had never visited the site before giving his advice and was unaware of this historic hedge. The hedge features in the Woolpit Neighbourhood Plan - Landscape Appraisal (March 2018) which should be the guide for those drafting the future development of the village of Woolpit and employees seeking to give advice to developers.

4. **Key Social Issues**

i. Social Issue (iv) concedes that in rural districts, most houses are unaffordable to many people with no suggestion as to how the Council would be able to persuade developers to build **all** their houses at affordable prices. The significance of this passage in the JLP is the prospect of hundreds of houses being forced on villages, which are not affordable to the local inhabitants and will only attract wealthy outsiders who will simply travel to large urban towns such as Cambridge, Bury St Edmunds, Ipswich and even London for their employment and will not contribute to the communal life of the village.

ii. Truly affordable climate and eco friendly housing is possible as has been achieved both in Norwich on their Goldsmith Street estate and in Cambridge on the Marmalade Estate. Both these estates were built at half the cost of houses on commercial developments. The District Council should be aware of these completed projects and have the imagination to adapt them to suit housing projects in the villages in its rural villages.

5. Key Environmental Issues

Environmental assets are listed as including high volume Grade 3 Agricultural Land. The JLP does not tackle the task of preserving this vital asset. Landowners seeking to develop sites presently consisting of such high quality agricultural land make no apologies for the destruction of the same. The proposals of the Council in the Plan all involve the destruction of this asset. The Council in their Plan make no suggestions as to how their wanton destruction of this asset can be avoided or replaced.

6. Housing Needs and Requirements.

The figures given in the JLP are 15 months out of date. It must have been possible for the authors of this plan which was published mid July 2019, to have at least given the true figures as at April 2019 rather than those for April 2018. This failure to give correct figures is sadly a feature of the work of the District council employees. The Planning dept must have to hand the precise number of applications that have been given approval and the total number of houses involved. The JLP ought not to be approved or adopted unless the correct figures, especially the number of houses for which approval has been given, have been given and are up to date.

7. The Environment LP 16 Environmental Protection

i. In JLP / LP 16 15.02 mention is made in respect of land and air pollution and the impact of developments on local air quality. Yet the largest development recommended by the JLP Plan for Woolpit, namely the Broadgrass Green development of 500 houses (LA 095) on open prime agricultural land north of the village, is adjacent to the south side of the A14 - one of the busiest roads in the country which carries a steady stream of cars and heavy lorries 24 hours a day. House owners on this site of 500 houses will suffer this air and noise pollution 24 hours a day - 7 days a week, if this development is allowed to go ahead. JLP makes no suggestions whatsoever as to how this could be avoided.

ii. JLP 16 15.05 claims that the local plan seeks to protect high quality agricultural land yet every one of the sites selected in Woolpit for development by the JLP Plan is just that - high quality agricultural land that once built on will be lost as a prime resource in a county and country that depends on its land for its existence.

iii. The initiative of Norwich City Council who dispensed with developers on the Goldsmiths Street which is mentioned above at para 4 (ii), and whose scheme has been selected for a RIBA award, has not been copied nor given any mention in the JLP Plan. This estate has been built without the intervention of a developer. The houses are rented from the council with secure tenancies at fixed rents and the houses are so energy efficient that occupiers can expect a 70% reduction in their fuel bills. A similar estate exists at Marmalade Lane on the Orchard Park estate in Cambridge with houses costing half the price of similar houses in the city.

iv. It is ironic that in para 3 of Policy LP24 it is written that **“all developments must also demonstrate that they conform to Neighbourhood Plan”** yet there is very little effort to incorporate any of the recommendations of these plans in the JLP. None of the recommendations made in the draft **Woolpit Neighbourhood Plan** are reflected in the JLP. Indeed in recent correspondence and discussions with a particular developer, the District planning officer did not seek to correct the developer when the developer stated at page 6 of his application:

“A Neighbourhood Plan area was designated for Woolpit in May 2016 and the Plan remains at an early stage in terms of its preparation (policies not yet published). It is therefore given very limited statutory weight”.

Nothing could be further from the truth and the District Planning officer who saw the developer in April 2019 ought to have made this clear as the pre-submission plan of some 67 pages was with the District Council at the time.

v. Para 3 of the Policy LP24 states that *“Developments which fail to improve the quality and character of the area will not be supported.”* could not be further from the truth in respect of developments proposed by the JLP Plan for Woolpit, an historic village with its roots in medieval times. Nothing in the plan for the village of Woolpit seeks to reduce the volume of traffic through its historic centre - quite the opposite, the proposed additional 700 plus houses, will simply damage the foundations of the historic houses and lead to serious damage to the structure of the village.

8. Woolpit Land allocation

i. JLP LA 093 - LA 097 which purport to give an indication of the allocation of existing or proposed planning applications is inaccurate in many respects or has not been up dated over the past 15 months prior to publication of the JLP Plan.

ii. JLP LA 095 (the Broadgrass Green site) is the largest proposed allocation of land for housing but as we have pointed out above, the Plan simply accepts the proposals of the developers, Hopkins Homes, for a development which has been

conceived with no imagination whatsoever. The development will seriously detract from the landscape and views to the north of the village. The impact of an additional 1,000 cars plus on the village will be crippling. The figure of 500 houses for the site shows that the authors of the JLP have merely accepted the figures sought by the developers without any proper investigation as to the adverse impact that such a development will have on the village of Woolpit .

iii. What is noteworthy is that the development will require considerable essential infrastructure such as a new primary school, pre-school, playing fields, health centres and a link to junction 47 of the A14, yet the developers will not be expected to pay for the majority of the necessary cost of such essential infrastructure - one might say that this is because that the developers have pleaded with the council that to do so would make too greater impact on their profits!

iv. Sites JLP LA 096 and LA 097 have never been raised with the Parish Council or with the inhabitants of the village. Yet the public may have noticed that the sites have been cleared of undergrowth and given a reference number by the Council and an allocation of a specific number of houses. Is this yet another instance where the developers have had private and confidential discussions with the Planning department officers as they did in respect of the Old Allotments site and that the officers have already signified their approval for these sites but have not informed the village of this fact? If so these discussions should have been disclosed to the Woolpit Parish Council members and referred to in the JLP.

v. Site LA 094 is stated to have permission for 120 houses yet the extension shown to the south west is a part of the site for which the developers have already been in discussions with the Planning dept and have sought permission to build a further 45 houses. None of this is mentioned in the Plan. This failure to be open and frank with the public is a feature of the present planning process.

9. Brown field sites.

i. Nowhere is there any detailed account in the JLP of the efforts, if any, made by the Council to identify suitable "brown field" land suitable for building houses in Woolpit or in the whole of the Mid Suffolk District. The Campaign to Protection Rural England predicts that brownfield sites could overall provide land for up to a million new homes a year.

ii. Developers do not want to develop "brown field" sites as it costs them more in initial outlay and thus eats into their profits. It is far easier to plough up virgin grade 3 agricultural land than to clear a *brown field* site of its former use.

10. Implementation and delivery.

i. The Plan of its very nature must depend to a great extent on the Council's Planning department and its ability to implement the same but there may be many in

the District who have lost any confidence in that department to achieve this and to act with the interests of the local inhabitants in mind and not those of the developers.

Two instances may suffice.

ii. In respect of a development in Green Rood, Woolpit, the Parish Council were assured by the Planning department that **before** the developers could proceed, the recommendations of the Government inspector regarding the junction of Green Road and Drinkstone Road and the pinch point in the road leading to the village would be addressed and resolved.

iii. To the horror of many including the Parish council who had not been consulted, it was discovered that the Planning Dept had signed off this problem as having been addressed and informed the developers accordingly. The Planning department claim that this a computer error! The developers must have been delighted as it thus cost them nothing to remedy this problem, especially as the problem was itself probably insoluble and would have made this development impossible. The Planning department had not made any realistic effort to remedy this serious mistake - if it was a "mechanical" mistake as claimed, yet it surely must have been capable of being remedied and this accidental purported permission revoked.

v. At a public meeting in the Institute in Woolpit, Mr Pateman-Gee of the Planning dept made the following admissions:

1. The measurements on the drawing on the plan of the layout of the junction in question prepared by the Planning Department was not such as could be relied upon as accurate measurements.
2. He agreed that a proper survey would be helpful as no such survey had been made - why?
3. He had not visited the site himself prior to the meeting
4. No legal advice had been sought to see if the "*mistake*" (the so called "accidental" approval) by the staff of the department could be cured.

vi. He was then asked why he had during the first week of April 2019 seen an agent of the proposed developers of a site to the south of Rags Lane and subsequently written to the agent on 12th April 2019 indicating that he and his officers would give approval for the development.

vii. His confidential letter only came to light two months later on 6th June 2019 when the applicant referred to it at page 8 of his formal application.

viii. The letter of 12th April 2019 was in fact inaccurate as he wrote:

" as discussed there are no planning issues that stand out and this would make a supportable development site."

Apart from the fact that three earlier applications in respect of this site had failed following serious local objection, this statement had to be subsequently corrected by

another member of the same planning department when the Town and Country Planning Notice was nailed on 26th June 2019 to a telegraph pole in Rags Lane three weeks after the formal application had been made on 6th June and stated that:

- a. The proposed development does not accord with the provisions of the development plans in force in the area in which the land to which this application relates is situated....*
- b. The application affects the setting of a listed building*
- c. the application adjoins a conservation area.”*

ix. He does not appear to have told the agent that the site was designated in the draft Neighbourhood Plan as a “*Local Green Space*”, even though he had a copy of this plan at his disposal. The applicant, Ben Elvin - a planning consultant, must have been aware of this as he says , incorrectly, that

“ A Neighbourhood plan area was designated for Woolpit in May 2016 and the Plan remains at an early stage in terms of its preparation ...It is therefore given very limited statutory weight.”

x. Apart from there being no evidence of the Planning department seeking to correct this erroneous statement, (see 7 (iv) above) it could not be further from the truth. The final version of the plan has been given to the village as whole and their comments will be incorporated and submitted to the the District Council and its Examiner in a matter of weeks.

xi. When questioned as to the propriety of council employees having confidential discussions with members of the Planning department and the giving of provisional approval to planning applications and seeng developers privately; Mr Pateman-Gee said that “*if I did not see them privately, they might not come to see me*”!

xii. He had no authority to have such discussions with developers without first making it clear that he would inform the councillors for the ward concerned and the chairman of the parish council of what had taken place and informing them of the assurances which he proposed to give and giving the councillors and the chairman of the PCC an opportunity to comment or object.

xiii. Such conduct gives the inhabitants in the Mid Suffolk District little confidence in the impartiality of those employed to represent them.

11. The Woolpit Neighbourhood Plan 2016 - 2036

- i. This plan has been prepared for the Parish Council and reflects the views of the inhabitants of the village who have been given several opportunities to express their wishes for the future of the village.
- ii. It has been written in a most professional manner and in good clear English. It avoids using the jargon much favoured by the staff of the District Council. It may be the view of many that though written by ordinary members of the village, it is far more professional than the JLP written by the Council.
- iii. The District Council could do well to adopt it in its entirety in place of their own recommendations for the village.
- iv. Unlike the JLP of the District Council, it addresses the issues in a balanced and constructive manner rather than just stating governmental platitudes.
- v. Though it has just two more stages to complete, namely the consideration by the Examiner and the Referendum, it is sufficiently complete and should already be required to be the guide for the Planning Department in respect of all planning matters affecting the Village.
- vi. The District Council should adopt in their entirety the Landscape Appraisal Summary of Findings on pages 63 - 65. and the recommendations in the Glossary at page 62 should be followed. Nothing so comprehensive as these appear in the JLP of the Council.
- vii. In answer to the Community Questionnaire, the following six criteria were rated “Essential” by more than 50% of the respondents and “Essential or Very Important” by over 85% of the respondents:

	Essential	Very important
Woolpit should remain a village	76.7 %	17.1%
Protect its historic heritage and character	72.4%	22.2%
Protect the landscape of the setting of the parish	61.4%	30.0%
Improve safely on its roads, footpaths and cycle paths	55.3%	30.0%
Protect and enhance the biodiversity	53.8%	32.2%
High quality healthy lifestyle.	52.8%	36.0%

12 Conclusion

Our response to the recommendations of the JLP of the Mid Suffolk District Council is that the Council should follow its own advice given in paragraph 3 of Policy LP 24 where the JLP states:

“All developments must also demonstrate that they conform to Neighbourhood Plan .”

As regards Woolpit, that means that the Council's plan should just follow the conclusions given in paragraph 7.4.1 of the Woolpit Neighbourhood plan at page 65 which states:

“In conclusion this assessment has revealed that Woolpit has the capacity to accommodate appropriately designed residential and commercial development. To ensure a good fit between new and old it is important that any new developments seeks to conserve and enhance the character of the existing settlement in terms of urban form as well as character. The settlement has a number of sensitivities related to its its special qualities and as a result opportunity for developments tend to be small scale. The future growth of Woolpit should therefore comprise a number of small to modest scale developments rather than a single or couple of large scale schemes. “

To which we would add: **“Not the 500 houses proposed for the Broadgreen Green site to the north of the village”**.

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Copies

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