

## Reasons for Refusal

### Introduction

The application site is situated in the Countryside and adjoins East Bergholt, designated as a Core Settlement Village within the Babergh Core Strategy and Policies Development Plan Document 2014. The Plan makes it clear that the Spatial Strategy is that growth will be jobs-led, rather than homes led. East Bergholt, along with nine other settlements, has been designated as a Core Village not because of size or potential opportunities for growth, but because they provide a number of essential services and facilities to a catchment area of smaller villages and rural settlements. The designation as a Core Village does not automatically confer a certain level of expected development. Growth will depend on the size, character, location and proximity of the settlement to towns and other Core Villages, and the role the settlement plays within its hinterland.

When considering the Scale of proposals in relation to an existing settlement, policy CS11 requires proposals to demonstrate that the development can be accommodated without adversely affecting the character of the village and that the services, facilities and infrastructure have the capacity to accommodate the level of development proposed. Further that the proposals should meet locally identified need.

The Parish raise the following objections and consider that these form reasons for refusal.

#### 1. Size of the Village and Scale of Development

Development Plan Policies CS2 and CS11 seek to control the delivery of rural growth housing over a 20 year period. The Policy requires that 10 Core Villages and 43 Hinterland Villages will provide for 1,050 dwellings during this 20 year period for rural growth.

The proposal is for the erection of 144 dwellings. This equates to an approximate increase in the population of the village by 20%. When judged against policy CS2, if permission is granted, East Bergholt will contribute nearly 15 per cent of the total Core Strategy rural

growth figure of 1,050 dwellings, leaving 906 dwellings to be distributed amongst the remaining 52 villages.

The Applicants have failed to provide sufficient and compelling evidence that this proposal is appropriate. It is the opinion of the Parish Council that this development represents a wholly unreasonable scale of development. It is disproportionate to the size of the existing village and Parish. It fails to respect the Development Plan for the planned sequential growth of the rural areas. The development sets a poor and dangerous precedent for other similar scale developments adjoining designated Core Villages. Between the medium to latter development plan periods, it will be extremely difficult to resist additional development of a similar scale adjoining other parts of the village. The application should be refused as it fails to accord with Policies CS2, CS11 and CS15 of the Core Strategy and Policies Development Plan Document dealing with spatial strategy, the strategy for development of Core and Hinterland Villages and Implementing Sustainable Development in the District.

As a separate matter, Members of The Parish Council would like the District Council to note that if Brantham Regeneration Project is successful in achieving a planning permission for housing, the level of rural housing growth in the District will be cumulatively much greater than originally planned for and mitigated for in the Core Strategy.

## 2. Need and the availability of Services and Facilities

East Bergholt has grown incrementally over time to support the village and the settlements in close proximity. The facilities including the nursery, two schools, the two community buildings, post office and surgery which have also developed incrementally and support the village's needs. The objectives of the Core Strategy are to provide a mixed and balanced community and support economic growth and to meet locally identified housing need. Policy CS 11 criteria iv) and CS15 iv) refer.

The Applicants have put forward a single development of 144 dwellings including 50 affordable housing units. They provide evidence that they say supports this level of growth. However, it is the opinion of the parish Council that the need expressed in the reports has

been over-estimated. A recent affordable housing development within the village took a considerable period of time to let. The needs assessments have failed to provide secondary information to support the assertions made. Given the Parish Council's knowledge and in consultation with local estate agents and other interested parties, that the results obtained are likely to have measured people's aspirations and that the waiting lists could also be more aspirational and particularly with respect to the Council housing registers may not necessarily demonstrate the most up to date position. Given the concerns of the Parish, the Parish request that the Authority undertakes its own analysis of the data and analyses how the data was obtained, given the disproportionate scale of the development compared with the needs identified in the Core Strategy for rural growth and the allocation of only 1,050 dwellings across the whole of the rural area. The proposals and supporting information fails to provide adequate information as to the extremely limited employment provision, contrary to the Core Strategy Spatial Strategy for job-led growth and the provision of a balanced community. The proposals are therefore contrary to CS 11 iv and CS iii of the Core Strategy and should be refused.

Further, that East Bergholt has limited services and facilities and the proposals fail to demonstrate how this level of growth is being matched by the existing services and facilities. Employment is very limited in the village. The Applicants have failed to demonstrate how the balance between homes and jobs will be affected contrary to SPD CS11. Furthermore, given the distances, tortuous and convoluted routes for pedestrians and the lack of quality footpath routes to the village services from the site, it is considered that for many residents of the proposed development, particularly those towards the fringes of the development, they will be reliant on the motor car to access such services. This is contrary to adopted policy CS11 criteria v and vi and criteria iii, iv, v and vi of policy CS15 and should be refused.

### 3. Cumulative Impact

Policy CS11 criteria vi requires that developments score positively against the cumulative impact of development in the area in respect of social, physical and environmental impacts.

Although there are currently no other similar applications before the District Council the

Parish Council are of the opinion there are other sites, that could come forward with much lower numbers, which would meet the Parish's assessment of the needs of the village and wider area and relate better to the village. This would also mean that development can come forward over a longer period. If Moore's Lane site is permitted, then it will be more difficult to resist other developments towards the later part of the plan, substantially increasing the population of the village contrary to the objectives of Core Strategy Policy CS11 criteria vi.

#### 4. Constraints and Impacts

Core Strategy Policies CS11 i and ii and CS15 I and ii, require development to score positively and respect the landscape and local character, shape and scale of the area. The main evidence of the Applicants addressing this issue is contained within the Landscape impact Assessment and Design and Access and Sustainability Statement.

However it is considered that this evidence has failed to properly assess the scheme in the wider landscape and the nature of potential impacts. It is considered that the site will occupy an exposed location extending the village and will be prominent in the landscape on an important approach by foot and by vehicle into the village. This is particularly the case when viewed from the west. The Applicants describe this sensitivity as low; citing that those experiencing the view would only be motorists and farm workers. However, the primary short, medium and long views into the village, viewed by many local people as well as tourists and visitors will be accessing the village from this location, with the backdrop of the AONB. The proposals show next to no meaningful mitigation to this western boundary. The application should be refused as being contrary to policies Core Strategy Policies CS11 criteria i and ii and CS15 criteria i and ii.

The Parish Council are also concerned that this level of development will have an adverse impact on the local and strategic highway network, particularly causing congestion and increased waiting times at junctions and the proposals are very likely to result in highway danger to users of the junctions to the A12 Trunk road because of increased traffic on the existing slip roads with little opportunities to mitigate the harm. The application should be refused on the grounds of highway congestion and safety.

The land is Grade 2 farm land. The Applicants describe it as “not the best and most versatile land”. However the NPPF describes grades 1 to 3A to be the ‘best and most versatile land’ Annex 2 of the NPPF. However, for Babergh as a whole, the Council is not facing significant development of Agricultural land to then be required to use areas of lower quality land. It is contended that this level of development is not needed and the use of this large area of Grade 2 Farm land is not supported by the Parish and is contrary to the National Planning Policy Framework. The application should therefore be refused.

5. That the development fails to make a positive contribution to the Local Character, shape and scale of the area.

The Core Strategy Policies require the development to score positively in respect of landscape, environmental, heritage and locational context. The development should be compatible with the village and make a positive contribution to the Local Character, shape and scale of the area. Policy CS15 criteria ii refers.

Apart from the concerns regarding Landscape Impact, the Parish Council consider that the open space feature in the south east corner of the site fails to provide a well-planned layout and is not a feature that is appropriate in a village setting. The positioning of houses is awkward and will fail to provide a satisfactory form of enclosure of space and street scene. The houses appear to have been dropped around the open space and overall its execution is weak. Fundamentally the treatment of the countryside edge is poor. There has been little attempt to screen the development from the west with the sides of houses and roadways and parking coming up to and immediately adjoining the field edge. Given the concerns

expressed in relation to landscape impact and the scale of development, in order to achieve an effective mitigation of the development the land proposed to be developed on the western and north western portions should instead be a wide strategically landscaped edge. The proposals therefore are not in accordance with policy SC15ii of the Core Strategy and should be refused.

#### 6. Viability

The application is not supported by a viability assessment. Given the level of development being proposed, the nature of that proposed development and the requests for a considerable sum of money from Suffolk County Council to mitigate for the development and the affordable housing element of the scheme, the Parish Council are concerned that the Applicants may latterly claim that the proposals are not viable and seek an increased level of development. The Applicants should be requested to provide evidence to deal with this.

#### 7. Archaeology

The Parish support the findings of the County Archaeologist that given the lack of previous investigation and large size of the proposed development area requires that the applicants should provide a full archaeological evaluation of the site.

The Parish considers that in the absence of this proper evaluation the application should, in addition to the points raised above, be refused on Archaeological grounds.

#### Note:

The Parish Council request the opportunity to comment further on all matters following the receipt of all of the responses of the statutory consultees.