

## Mid Suffolk District Council

### Stradbroke Neighbourhood Development Plan

### Submission Consultation Responses



In April 2018 Stradbroke Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Mid Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Thursday 19 April 2018 until Friday 1 June 2018.

Nineteen organisations / individuals submitted representations. These are listed below, and copies are attached.

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# SBK-1 Suffolk County Council

Date: 31<sup>st</sup> May 2018  
Enquiries to: Cameron Clow  
Tel: 01473 260171  
Email: Cameron.clow@suffolk.gov.uk



Spatial Planning Policy Team  
Babergh & Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

Dear Paul Bryant,

## **Submission version of the Stradbroke Neighbourhood Plan**

Thank you for consulting Suffolk County Council on the submission version of the Stradbroke Neighbourhood Plan.

Suffolk County Council is supportive of the Neighbourhood Plan's vision for the Parish and we note that our comments from the previous consultation have been incorporated into the plan, which is welcome. Comments made in this response relate to the basic conditions a neighbourhood plan must adhere to in order to progress to the referendum stage.

### Archaeology

Regard to the archaeological aspect of heritage in policy is welcome, however the County Council would recommend amendments to policy in order meet the basic condition of having regard to national policy.

The following amendment is suggested for the archaeological bullet point of Policy STRAD12

"Archaeological investigations are undertaken prior to submission of planning applications and/or development if there is a reasonable likelihood of archaeological remains being found on or adjacent to the site"

In order to provide clarity in relation to the National Planning Policy Framework amendments should also be made to the archaeological bullet points in policy STRAD18 and STRAD19.

"As the site is on the edge of the medieval settlement and has not been systematically assessed for archaeological remains, any planning application should be supported by the results of an archaeological evaluation which enables impacts on archaeological remains to be considered and to allow for preservation if appropriate, or proposals for other mitigation."

### Flooding

It is welcome that issues regarding the flood management policy have been addressed and that the relevant local and national policy has been referenced. However, regarding the final paragraph of policy STRAD5, it may not be possible to completely exclude schemes which place some responsibility for the cost of drainage schemes onto residents, whether the cost is paid to Anglian Water or a private management firm.

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX  
[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

1

While the County Council understands the intent of this policy and encourages adoption of drainage solutions by a risk management authority (as set out in Suffolk's Flood Risk Management Strategy), Schedule 3 of the Flood and Water Act (2010), which would require the approval and adoption of SuDS, has not yet been implemented by Government. Instead a Ministerial Statement has been released on 18<sup>th</sup> December 2014 setting out the expectations and use of SuDS which states that "The sustainable drainage system maintenance and operation requirements should be economically proportionate"

Government has not yet chosen to progress with secondary legislation, which would require approval and adoption of SuDS.

Therefore, inclusion of this paragraph would mean that this part of the plan does not meet the basic condition that "the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development." as it could preclude development which is otherwise sustainable.

It is recommended that the last paragraph of policy STRAD5 is deleted, as reference to the sequential test should already ensure that if it is possible not to place responsibility onto residents then should not.

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I hope that these comments are helpful. The County Council is always willing to discuss issues or queries you may have. If there is anything I have raised you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Cameron Clow  
Planning Officer  
Growth, Highways and Infrastructure

## SBK-2 Environment Agency



Mr Paul Bryant  
Suffolk County Council  
Property  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Our ref: AE/2018/122777/01-L01  
Your ref: Stradbroke NHP  
Date: 01 June 2018

Dear Mr Bryant

### STRADBROKE REGULATION 16

ENDEAVOUR HOUSE RUSSELL ROAD, IPSWICH, SUFFOLK, IP1 2BX.

Thank you for consulting us on the Stradbroke Neighbourhood Plan.

Our principal aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences
- Protect and improve water, land and air
- Work with people and communities to create better places
- Work with businesses and other organisations to use resources wisely

You may find the following two documents useful. They explain our role in the planning process in more detail and describe how we work with others; they provide:

- an overview of our role in development and when you should contact us.
- initial advice on how to manage the environmental impact and opportunities of development.
- signposting to further information which will help you with development.
- links to the consents and permits you or developers may need from us.

Building a better environment: Our role in development and how we can help:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289894/LI\\_T\\_2745\\_c8ed3d.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LI_T_2745_c8ed3d.pdf)

Environmental Quality in Spatial Planning <http://www.english-heritage.org.uk/publications/environmental-quality-in-spatial-planning-supplementary-files/>

Environment Agency  
Cobham Road, Ipswich, Suffolk, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

## Flood Risk

Areas within the Stradbroke Parish fall within Flood Zone 2 and 3 as defined by the Planning Guide. All future development proposals within a Flood Zone (which includes Flood Zones 2 and 3, as defined by us) shown on the Policies Map, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment (FRA). The designated areas for development within the Neighbourhood Plan do not appear to fall within Flood Zones 2 or 3. If this changes then the developments should be sequentially sited.

## Natural Capital

We welcome the recognition given to the importance of local green spaces. Further exploration of how these spaces relate to each other and to habitat outside of the village boundary (connectivity) would give you an understanding of how "green corridors" could be created and enhanced.

It is also important to recognise and value the "blue environment." There are ecological improvements needed to be made to the two tributaries of the Waveney close to Stradbroke: Chickering Beck (waterbody ID GB105034045690) and the unnamed tributary GB105034045740. Works that need to be undertaken for these waterbodies to achieve Good Ecological Status include undertaking river habitat enhancements, riparian tree planting and working with local landowners to reduce diffuse pollution from agriculture.

Any new development must not cause a deterioration in Water Framework Directive status to either of the above waterbodies. For example, drainage from new housing should be designed to trap and control pollutants from domestic car washing and the use of garden pesticides and herbicides.

## Sustainable Drainage Systems

The Neighbourhood Plan states that it will look to use Sustainable Drainage Systems (SuDS) where possible. In brief, our general requirements with regards to SuDS are:

1. Infiltration SuDS such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination.
3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.

Cont/d..

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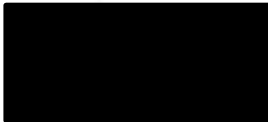
5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction). If deep soakaways are proposed you should contact us, as an environmental permit maybe needed.

Please also refer to the SuDS Manual (CIRIA C753, 2015), the Susdrain website (<http://www.susdrain.org/>) and the draft National Standards for SuDS (Defra, 2015) for more information.

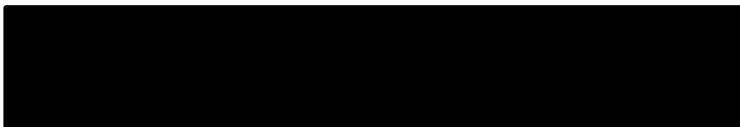
Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan

Yours sincerely



**Miss Natalie Kermath**  
Planning Advisor



End

3

## SBK-3 Historic England



By e-mail to:  
Paul Bryant  
Spatial Planning Policy Officer  
Babergh and Mid Suffolk Councils

Our ref: PL00390902  
Your ref: N/A  
Date: 23/05/2018

Dear Paul,

**Ref: Stradbroke Neighbourhood Plan Regulation 16 Consultation**


Thank you for your correspondence dated 18 April 2018 inviting Historic England to comment on the Regulation 16 Submission version of the Stradbroke Neighbourhood Plan.

We do not wish to provide detailed comments at this time. We would refer you to our **previous advice submitted at Regulation 14 stage**, and also to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:  
<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries

Yours sincerely,

  
Edward James  
Historic Places Advisor, East of England  
Edward.James@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



**NB: To see a copy of Historic England's previous advice submitted at Reg 14 stage please see: [Consultation Statement Appendices E to H](#) (pages 27 – 29)**

## Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Stewart Patience
Job Title (if applicable):	Spatial Planning Manager
Organisation / Company (if applicable):	Anglian Water Services Ltd
Address:	Thorpe Wood House, Thorpe Wood, Peterborough
Postcode:	PE3 6WT
Tel No:	REDACTED
E-mail:	REDACTED

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

## Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Policy No.	STRAD1

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:
<p>Anglian Water is supportive of Policy STRAD1 as it states that development on the site identified in the Neighbourhood Plan will be expected to address the provision of utilities infrastructure including that provided by Anglian Water.</p> <p style="text-align: right;"><i>(Continue on separate sheet if necessary)</i></p>
What improvements or modifications would you suggest?



Please be as brief and concise as possible

(Continue on separate sheet if necessary)

## Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Policy No.	STRAD4
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Anglian Water is generally supportive of Policy STRAD4 as drafted however we would ask that a number of changes are made to the wording to clarify the requirements for developers in respect of foul drainage.

Policy STRAD4 states that applicants should consider all reasonable and sustainable options in respect of foul drainage and cross refers to paragraph 16 of the National Planning Practice Guidance (NPPG). In terms of the available options for foul drainage - the expectation is that foul flows would normally be discharged to a public sewer with alternatives only be considered where this is demonstrated not to be feasible (in terms of costs/practicability) as outlined in the NPPG. (Paragraph: 020 Reference ID: 34-020-20140306).

Para 16 of the NPPG relates to water quality and states that a detailed assessment would be required at planning application stage only where there is a significant risk to water quality from new development.

It is therefore suggested that policy be amended to make it clear that applicants will be expected to provide sufficient evidence to demonstrate that there is currently capacity within the public sewerage network in Anglian Water's ownership or that appropriate mitigation can be put in place in time to serve the development.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

It is therefore suggested that the second bullet point of Policy STRAD4 be amended as follows:

'For the foul ~~waste drainage~~ **sewerage** network, this means demonstrating that ~~all reasonable and sustainable options have been considered~~ **capacity is currently available or can be made available in time to serve the development.** in accordance with National Planning Practice Guidance'

A consequential amendments is also suggested for the footnote 8 as follows:

" National Planning Practice Guidance reference Paragraph: ~~016~~**20** Reference ID: 34-016-20140306 (Revision date: 06 03 2014), or any successor reference'

(Continue on separate sheet if necessary)

## Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

<b>Paragraph No.</b>		<b>Policy No.</b>	<b>STRAD5</b>
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support     **Support with modifications**     Oppose     Have Comments

**Please give details of your reasons for support / opposition, or make other comments here:**

We note that an additional policy relating to flood risk management has been included in the Neighbourhood Plan which is fully supported.

The purpose of Sustainable Drainage Systems (SuDS) is to manage surface water and not the foul flows arising from new development. It is therefore suggested that Policy STRAD5 is amended to make it clear that the provision of SuDS relates to the management of surface water flows.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

For the reasons set above the second sentence of Policy STRAD5 should be amended as follows:

‘Flood risk **from surface water** should be managed using Sustainable Drainage Systems (SuDs) and the method of discharge should be as high up the following hierarchy of drainage options as is possible, once the other options have been proved not to be viable:’

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

Please be as brief and concise as possible

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	✓
The final ‘making’ (adoption) of the NDP by Mid Suffolk District Council	✓

**Signature:**

**Date: 17<sup>th</sup> May 2018**

## SBK-5 Stradbroke Parish Council

By e-mail

Dated: 10 May 2018

To: BMSDSC Community Planning

From: Stradbroke Parish Council

Subject: Stradbroke Neighbourhood Plan Reg 16 comment - surface water flooding issues in Stradbroke

During the recent Regulation 14 consultation undertaken by Stradbroke Parish Council a representation was received from Suffolk County Council. In this representation there was a request for evidence of local flooding as SCC had no record of any such events.

Here is an example of a recent event following heavy rain on 02 and 03 April 2018. This occurred at the convergence of the 2 ditches on Laxfield Road where they run into the culvert under Laxfield Road and join a third ditch running on the north side of the Road. These photos are taken on the north side of the Laxfield Road , the problem was thus not caused by a culvert blockage under the road.



Ditch from Neaves Lane beyond low point of Laxfield Road



Ditch from Neaves Lane at low end of Laxfield Road

I understand the water rose to within a foot of package works electrical equipment in several local homes and came close to causing a major problem. I understand the back fill also flushed out some package plants although I cannot prove this.

The culvert in the “ditch beyond Laxfield Road “ photo has now been reinforced with an additional pipe to channel high levels of surface water, but that will only channel it faster somewhere else lower down the ditch. It does not guarantee immunity from further events especially if applications come forward which are both package works systems, and also drain surface water to the ditch and offer no mitigation or proof of sequential testing.

As a matter of some importance Stradbroke NP site A (policy STRAD16) can mitigate itself with all measures of the sequential test as it can capture and infiltrate, drain to this ditch but also channel to the surface water sewer which is adjacent to the photo location without any easement/ ransom difficulties. As it now proposes to connect to a main sewer that option is also available if necessary.

I would therefore be grateful if you could post this comment on the Reg 16 site.

Kind regards

Chris Edwards  
For NP Group and PC

## SBK-6 Durrants (obo client)

By e-mail

Dated: 1 June 2018

To: BMSDSC Community Planning

From: Chris Hobson (Durrants)

Subject: Stradbroke Neighbourhood Plan – Regulation 16 Consultation

Dear Community Planning,

Please find attached representations on behalf of the land owner of the above site.

Please can you confirm receipt of email and representations.

If you have any questions or require any further information please don't hesitate to contact me on 01379 646603.

Kind Regards,

Chris

**Chris Hobson**, BSc (Hons) MSc MA MRTPI

Principal Planner

Offices at Beccles, Diss, Halesworth, Harleston, Southwold, Auction Rooms Beccles and Mayfair Office, London.



Our Ref: CH/AW/301177  
Your Ref:

1st June 2018

By email: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Mr Paul Bryant,  
Spatial Planning Policy Team,  
Babergh & Mid Suffolk District Council,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
IP1 2BX

Dear Sirs, Madams,

## Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

### Stradbroke Neighbourhood Development Plan 2016-2036

We write further to the Councils Regulation 16 consultation with respect to the Stradbroke Neighbourhood Development Plan, and wish to make the following representations on behalf of our clients. Our clients are the current landowners of the site referred to as NP12, Land to the east of Queen Street, (North of Shelton Hill) Stradbroke.

As you are aware the Neighbourhood Plan will need to meet the 'Basic Conditions' that set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (As Amended). In this regard we have concerns that the proposals would conflict with the objective of contributing to 'Sustainable Development', indeed we would contend that there are more sustainable and suitable alternative sites than those allocated for housing in the Neighbourhood Plan. We would also raise concern that the plan would conflict with national and strategic planning objectives and policies.

In this regard we also write with reference to the site Land to the east of Queen Street, (North of Shelton Hill) Stradbroke – Site (NP12). The site is adjacent to the development site at Grove Farm, Stradbroke which benefits from full planning permission reference 3774/16 (Allocated site, policy STRAD20). We also append our representations made at the earlier Regulation Consultation 14 Stage setting out our considered views on the suitability of the site for inclusion in the Stradbroke Neighbourhood Plan.

**BECCLES**  
01502 712122  
10 New Market  
Beccles  
Suffolk  
NR34 9HA

**DISS**  
01379 642233  
Pump Hill House  
2b Market Hill  
Diss, Norfolk  
IP22 4WH

**HARLESTON**  
01379 852217  
32-34 Thoroughfare  
Harleston  
Norfolk  
IP20 9AU

**SOUTHWOLD**  
01502 723292  
98 High Street  
Southwold  
Suffolk  
IP18 4DP

**HALESWORTH**  
01986 872553  
12 Thoroughfare  
Halesworth  
Suffolk  
IP19 8AH

**AUCTION ROOMS**  
01502 713490  
The Old School House  
Peddars Lane  
Beccles, Suffolk  
NR34 9UE

**MAYFAIR**  
0870 112 7099  
Coshel House  
15 Thayer Street  
London  
W1U 3JT

Registered Office: 32-34 Thoroughfare, Harleston, Norfolk IP20 9AU No. 2892242. Regulated by the R.I.C.S.

## Contribution Towards Sustainable Development

We reiterate that the Land to the east of Queen Street, (North of Shelton Hill) Stradbroke, (Site NP12) would form sustainable development and represents a reasonable alternative. Whilst other sites located on the south, east and west edges of the village have been allocated in the plan, notably site nos. 1, 2 and 3; site 12 which is located centrally within the village has not been allocated despite there being distinct benefits in its location and scoring similarly in the Stradbroke Neighbourhood Plan Sustainability Appraisal.

In this regard we would highlight that the location of site NP12 within the centre of the village offers easier access to the facilities within the village including the school, than those sites allocated. The proximity of the site to school on the opposite side of Queen Street will inevitably reduce the traffic at school drop off and pick up times when compared with those allocated sites on the edge of the village. It would also avoid the further elongation and spread of the village and built form outwards along key routes and gateways into the village. There would also be less prominent and wide ranging visual impacts on the character and openness of the countryside in comparison to those sites allocated.

When reviewing the core evidence base of the Neighbourhood Plan and comparing sites 1 and 12, we note that the site 12 scores equally well if not better in all other criteria within the Sustainability Appraisal (Pages 37 and 38) other than sustainability theme 5 (Environment-Heritage). However, the subsequent summary appraisal goes on to highlight that it is likely that these impacts on the historic environment are capable of being mitigated. When further considered against theme 1 (Environment - Countryside/Biodiversity) both sites have been equally scored. However, as highlighted in the summary appraisal those sites that are poorly located to the existing built up area would have a greater impact. In this regard site 1 sitting in a prominent site on the far eastern edge of the settlement and built form has a significantly greater impact on the character and openness of the countryside. We don't therefore consider that the impacts of both sites have been reasonably reflected in the sustainability appraisal. Furthermore, we note that site 12 has more positive benefits in terms of addressing housing need and providing for a mix of dwellings and affordable housing (theme 2, Social – Housing).

Therefore, having regard to the above we raise concerns that the sustainability appraisal and subsequently submitted Neighbourhood Plan would contribute towards sustainable development when considering that there are more sustainable sites that are available and deliverable than those sites put forward for housing allocation in the plan. We consider to contribute towards sustainable development the Sustainability Appraisal Neighbourhood Plan should therefore be revised to include site NP12 for allocation for residential development.

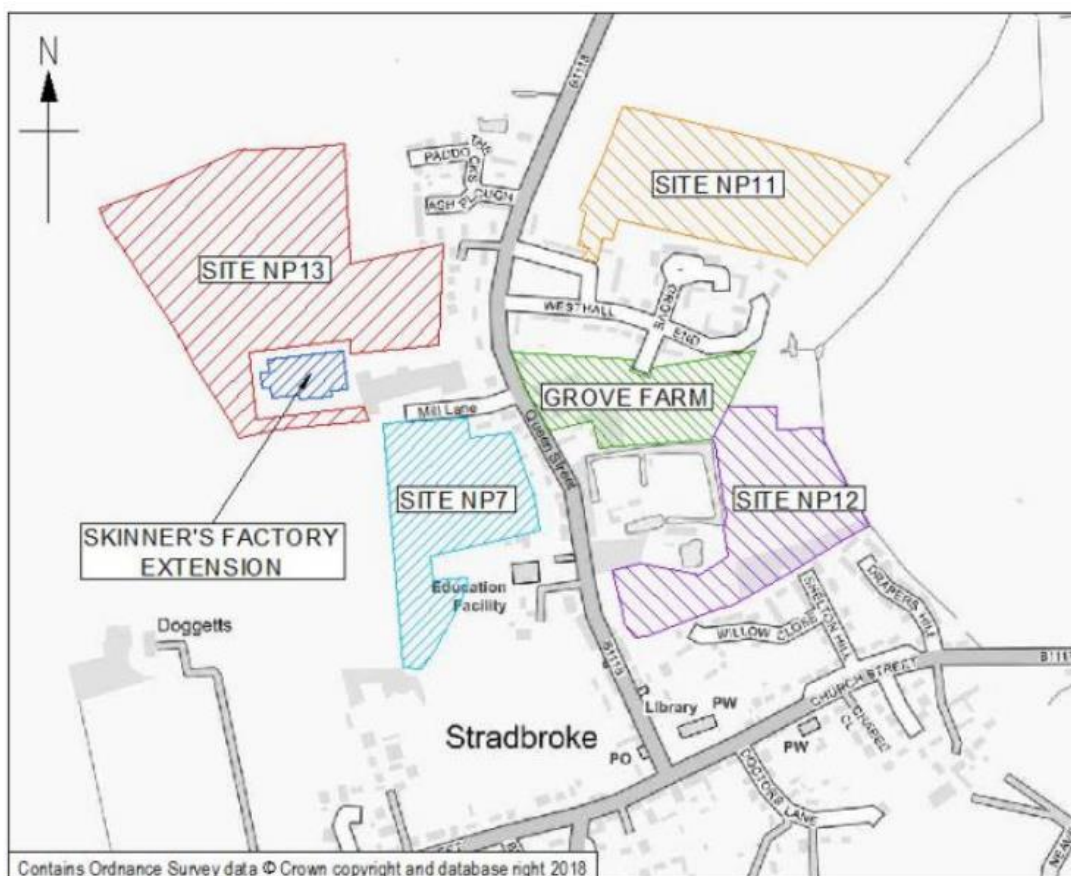
## Conflict with Strategic Policies and Evidence Base

In this regard it is unclear exactly why the Final Neighbourhood Plan does not appear to reflect the most up to date evidence prepared to support the Plan. In particular we note that Technical Note 02 prepared by AECOM of February 2018 has been prepared with the objective of informing the Neighbourhood Plan. In particular this report specifically assessed the traffic implications of delivery of the housing and commercial sites in the image below, which included the site north of Shelton Hill (NP12).

## **Proposed Allocation Sites**

### **Introduction**

This assessment considers the planned delivery of housing and jobs across the following sites in Stradbroke as identified in Figure 2 below. Further details are subsequently set out further below



**Figure 2: Proposal Sites**

Page: 6 of 23

A:\Transport Consultancy Projects\Job Folders\_605\60538603 - Stradbroke NP Access Review\02 Further Transport Work\07 - Reports\02 Final\Stradbroke - Mill Lane Transport Appraisal\_TN\_Final\_230218.docx

For Instance, the submission version of the Neighbourhood Plan still states as it did in earlier versions in section 9) Site Allocations point e) on page 38 that:

*“One of the main issues for growth in Stradbroke is the vehicular congestion and pedestrian safety on Queen Street, largely caused by the presence of the primary school and pre-school. The 44 dwellings with planning permission at Grove Farm (identified in Policy STRAD20), coupled with the growth proposed as part of the allocation of the land south of Mill Lane (Policy STRAD19), will put additional pressure on Queen Street, albeit that this is expected to be mitigated by improvements to cycling and walking access (through Policy STRAD8). Any significant further growth requiring vehicular access on to Queen Street has the potential to create severe cumulative impacts and will be resisted.”*

However, since earlier versions of the Neighbourhood Plan the above report has been commissioned and prepared to specifically assess the future operation and capacity of the Queen Street/ Mill Lane junction based on the planned delivery of housing and jobs in Stradbroke. Indeed, with respect to the existing future situation in 2036, the Conclusions and Summary, page 13 of Technical Note 02, (AECOM, February 2018) states that:

*“The PICADY results show that the existing Queen Street/ Mill Lane junction currently operates well within capacity during the observed weekday network peak hours of 08:00-09:00 and 16:45-17:45, with negligible queuing experienced at the junction.”*



*“The cumulative traffic flows for the future year assessment of 2036 included all traffic associated with the identified proposal sites. The growth factors for each weekday period were adjusted to take account of the site allocations for both employment and residential uses, to avoid double counting. The future operation of the Queen Street/ Mill Lane junction reflects the proposed four-arm staggered arrangement of the junction following the implementation of the Grove Farm development. The PICADY results demonstrate that the proposed Queen Street/ Mill Lane junction is forecast to operate well within capacity during the network weekday peak hours, with negligible queuing experienced at the junction.”*

The report therefore concludes that the residential and employment sites considered in the study including NP12 and other sites not allocated, could be brought forward by 2036 without requiring any additional highway capacity improvements at the Queen Street/Mill Lane junction. The position in paragraph e) of section 9 is therefore not justified or evidenced by the Neighbourhood Plan evidence base.

The Plan as submitted therefore has the potential to constrain the delivery of important national and strategic objectives, in particular the delivery of much needed housing in a sustainable location site on the edge of Stradbroke. There would also be conflict with strategic policies at the national and local level by preventing sustainable development on site NP12 from occurring.

Whilst we fully appreciate the implications of school traffic in peak drop of and pick up hours and implications on residents daily lives, paragraph e) of section 9 (Site Allocations) and the concerns raised through the consultation process, these do not reflect the above evidence prepared in support of the Neighbourhood Plan. We would therefore suggest that paragraph e) of section 9) Site Allocations on page 38 be removed in its entirety. Or indeed at the very least the final sentence which is underlined above of paragraph e) of section 9 ‘Site Allocations’ be removed.

### **Summary**

With respect to the submitted Stradbroke Neighbourhood Plan, we have set out a number of concerns above which we feel need further consideration and review before the Plan can be found to meet the basic conditions required of it. In particular, we have highlighted concerns that the housing allocations section seeks to without justification restrict what would otherwise be sustainable housing development. We have however suggested revisions above which we feel would address the issues set out above.

Finally, we would reiterate that the site ‘Land to the east of Queen Street, (North of Shelton Hill) Stradbroke (referred to as 12 or NP12) is a suitable, available and achievable site with no insurmountable technical, legal constraints that would prevent the site from coming forward. The site therefore represents a reasonable alternative site for housing allocation and in our view a more sustainable site than those allocated in the submitted Neighbourhood Plan. A matter that should be considered and revisited when considering whether the proposals would contribute towards sustainable development

I trust the above is clear, however please contact us should clarification be required on any point

Yours faithfully

**Christopher Hobson BSc (Hons) MSc MA MRTPI / Principal Planner**

[NB: To see a copy of the appended Reg 14 consultation response please see: [Consultation Statement Appendices E to H \(pages 66 - 74\)](#)]

## SBK-7 Cane (Resident)

By e-mail

Dated: 27 May 2018

To: BMSDSC Community Planning

Subject: Stradbroke NDP 2016-2036

Good morning Mr Bryant

Please find attached my response to the Stradbroke Neighbourhood Development Plan 2016-2036. I apologise for not using the response sheets provided and would be grateful if receipt of my document could be acknowledged at your earliest convenience. Many thanks.

### **BABERGH AND MID SUFFOLK DISTRICT COUNCILS REPRESENTATION FORM**

#### **STRADBROKE NEIGHBOURHOOD DEVELOPMENT PLAN 2016-2036**

Please accept my apologies for not using the response sheets provided.

Also, mainly, I am using information from the draft Pre-submission NP consultation document (Jan-March 2018 consultation), as I'm away the final week of this current consultation and am very short of time. I have hard copy of the previous draft NP, but there are no hard copies of the current final NP document for residents to remove from the Library and study at home. I did contact the Parish Clerk asking if a member of the NP team could identify changes made to the draft compared to the final document, but I was just directed to the final document website, which I didn't find very helpful.

**Although there are a number of statements in the Stradbroke NP that I endorse, unfortunately I do not feel able to support the Plan as a whole for the following reasons:**

(1) I had confidence in the integrity of the original NP team that undertook initial extensive consultations in the community for the first 2/3 years of work on this Plan. Unfortunately, this dedicated team resigned in its entirety in July 2017, due to disputes with the Parish Council.

(2) Unfortunately I don't have the same confidence in the new NP team, because since they have taken over the consultations have been less thorough and inclusive:

The consultation in October 2017 gave barely a week for responses; the consultation venue was cramped making it difficult for less able bodied residents to view the information; there were 4 new sites put forward for consideration with no previous information provided on these sites; the format of the online consultation could have been confusing as at a quick glance each site appeared to have 2 numbers.

(3) For the pre-submission consultation Jan-March 2018, [REDACTED] I was unable to respond. I tried to give my views on this consultation on two occasions in the Public Forum of the Parish Council meeting, but was refused. There was a lot of information to digest in the draft NP and the method of response was by email or post to the Parish Council in what was effectively essay format. There are a number of elderly residents in the village who do not have access to the internet, who are unlikely to make the journey to the Library for their comments to be recorded, and who would not feel inclined to sit down and write an essay on the NP. However, they might have been able to complete a hard copy, tick box consultation paper if it had been put through their doors.

There were only 29 responses to this consultation, and of these at least 7 were from public bodies. I think this could be viewed as a very poor percentage of responses.

## **STRAD 1: DEVELOPMENT STRATEGY AND PRINCIPLES**

I do not agree with all the sites listed – see comments in each site section. In the consultation of October 2017 there were 2 sites which to me seemed an obvious choice for development because they would exit onto New Street, which would reduce congestion on Queen Street – these were sites 5 and 6 - Land at Meadow Way and Cottage Farm. I wonder why these were rejected?

## **STRAD 2: DESIGN PRINCIPLES**

Whilst I agree with these principles I think they are optimistic – developers tend to cram properties in to remain financially viable.

**STRAD 3: HOUSING MIX** – ditto as above

## **STRAD 4: UTILITIES PROVISION**

I agree that drainage is important, but apart from when there is exceptionally heavy rain, I wouldn't have said Stradbroke was at risk of flooding. One area that can be at risk is near to the Primary School, which would point to ensuring less development in that area. I suspect that when flooding occurs it is likely due to blocked drains and ditches.

## **STRAD 5: FLOOD MITIGATION**

I don't quite understand this obsession with flooding. It is actually stated in the NP document that Flood Risk Mapping shows majority of parish is in flood zone 1 (low probability). And as stated above, one of the few areas that is affected by flash flooding in heavy rain is close to the Primary School, so why promote a development behind the school?

## **STRAD 6: EDUCATION AND HEALTH INFRASTRUCTURE**

Education- there was mention of relocating the Primary School in the pre-submission consultation, and this would be an obvious measure in order to relieve congestion by the School. However, I'm not sure if this comment was included in the current NP document.

Health – there is probably room to extend the current surgery which is in a very central position in the village, and has easy parking - it doesn't make sense to me to relocate it.

## **STRAD 7: COMMUNITY INFRASTRUCTURE**

Agree this policy

## **STRAD 8: HIGHWAY ACCESS AND PEDESTRIAN MOVEMENT**

Agree this policy, but the walkway routes look like existing pavements, so are unlikely to be built on I would hope.

## **STRAD 9: NEW ESTATE ROADS**

Agree this policy

## **STRAD 10: PARKING PROVISION**

Agree this policy

## **STRAD 11: LOCAL GREEN SPACES**

There should be absolutely no development on these spaces, even in very special circumstances.

## **STRAD 12: HISTORIC ENVIRONMENT AND DESIGN**

Agree this policy up to a point - I think there should be some compromises given in order to provide affordable housing.

## **STRAD 13: LIGHT POLLUTION**

Agree this policy up to a point – there are areas of this village that are very poorly lit, particularly in the depths of winter, and I think safety is of more importance than reducing light pollution.

## **STRAD 14: EXISTING EMPLOYMENT SITES**

Agree this policy, and every effort should be made to increase employment opportunities in the area. However, I think it is optimistic to hope that increased employment opportunities won't involve increased lorry or tractor movements.

## **STRAD 15: RETAIL PROVISION**

I think to locate any retail facilities out of the centre of the village would be detrimental to the existing outlets.

## **STRAD 16: LAND NORTH OF LAXFIELD ROAD**

Agree this site

## **STRAD 17: LAND EAST OF FARRIERS CLOSE**

Agree this site – possibly addition of extra land could be used for relocation of Primary School and Pre-School / Nursery facilities.

## **STRAD 18: LAND SOUTH OF NEW STREET**

Agree this site particularly addition to playing fields.

## **STRAD 19: LAND SOUTH OF MILL LANE**

I disagree that development of this site will alleviate congestion outside the Primary School. There are 2 development sites on the opposite side of the road from the school that already have planning permission – 1 small and 1 large. With other development sites proposed, there will inevitably be more traffic moving through the village and hopefully more children attending the schools. As I have said before, sad though it would be, the only real answer to protect the children's safety would be to relocate the Primary School and I think there should be long term planning for this.

## **STRAD 20: LAND AT GROVE FARM**

This already has planning permission, the only question about it is why is it not happening?

### **(10) Infrastructure Investment Priorities**

1. Nursery facilities should be the first priority

5. Improvements to Stradbroke Church – there is a church and a chapel in Stradbroke and I believe they should both be included.

I'm surprised that the Community Centre is not included in this list. Whilst I appreciate that the Centre has recently received a large amount of Section 106 + other funding, that money has been put to good use for the

benefit of the community. Stradbroke Court House and Library is listed as a priority, but this has also received funding recently.

**In conclusion** – I was disturbed to hear that a young parish councillor resigned recently (one of many) following a closed session of the PC where £2,000 was allocated to oppose one specific planning application. There are members of the PC on the NP team and I find this allocation of Precept funds highly questionable.

I apologise that this response has been hastily constructed, but I hope it helps

I would be grateful to receive publication of the recommendations of the Examiner. Thank you

## SBK-8 Darling (Resident)

By e-mail

Dated: 29 May 2018

To: BMSDSC Community Planning

Subject: Stradbroke Neighbourhood Plan – Consultation Response

Dear Sir/Mdm

Please see attached documents as a response to the Consultation process. I found it difficult to use the template provided, but have nevertheless tried to link my comments to specific policies and objectives within the draft plan. I also attach photocopy of a letter as an attachment to my responses. The reason for this is outlined in my response.

Would you be so kind and confirm receipt of this email and it's contents.

Your Sincerely

### Section One: Respondents Details

Part A: Respondent	
Title / Name:	Darling
Job Title (if applicable):	Redacted
Organisation / Company (if applicable):	Redacted
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Dear Examiner,

I hope you don't mind me not using the Consultation Reponse Form. I found it difficult to express my concerns and worries about the draft Stradbroke Neighbourhood Plan. Please find below my arguments why I think you should not accept the draft plan as it now stands and ask the Council to consider the following comments:

#### 1. The Consultation Process:

The consultation process is fundamental to the preparation of the neighbourhood plan. I believe that this has been compromised by the project team to such an extent that the data obtained from the second consultation is meaningless with regard to the site selection process. The number of respondents (130) is low compared to the original survey in 2016 (527) making it difficult to draw statistically significant conclusions about public preferences. The site assessment data (appendix J of the NAVIGUS report) and summarised below, indicate that given the low numbers of respondents there is likely to be no significant difference in scores for sites Q3 to Q9. The percentage figures give a false impression and should not have been used as a basis of site selection.

**Table 3.1: Q2-10. 'Does the evidence support the inclusion of the following sites?'**

		Yes	No	Skipped	% Yes	% No	% Skipped
Q2	Site 2	83	23	26	62.9%	17.4%	19.7%
Q3	Site 5	63	40	29	47.7%	30.3%	22.0%
Q4	Site 6	62	43	27	47.0%	32.6%	20.5%
Q5	Site 7	57	45	30	43.2%	34.1%	22.7%
Q6	Site 8	55	49	28	41.7%	37.1%	21.2%
Q7	Site 9	48	55	29	36.4%	41.7%	22.0%
Q8	Site 12	49	56	27	37.1%	42.4%	20.5%
Q9	Site 13	50	53	29	37.9%	40.2%	22.0%
Q10	Site 1	67	38	27	50.8%	28.8%	20.5%

In addition to the statistical issue of drawing far reaching conclusions from such low numbers, a number of residents have spoken to me about the use of Survey Monkey as a tool to carry out such an important survey. It is too easy for a resident to enter multiple responses from smart phones, PCs, I-pads, work computers and so forth making it easy to corrupt the data. Privately a number of residents admitted to me that they had in fact done so.

The first questionnaire carried out in 2016 was hand delivered to all households and analysed using secure software recommended by Community Action Suffolk. This prevented duplicate entries and also ensured a high response rate.

I believe the second village-wide consultation sacrificed the number of responses in order to hasten the analysis and presentation of the plan.

## 2. Process to Achieve the Stated Objectives

The objectives defined on p12 of the plan are laudable and key to the development of the plan. However, the process by which these objectives have been translated into specific plans and actions are vague and not at all transparent.

Despite the weak consultation process, the selection of sites, for example, lack any logical argument why one site is preferred over another. There is no evidence of scenario planning, what alternatives were considered prior to coming to the conclusion that a particular site was the preferred one? As an example, the decision to propose development at the rear of the primary school (STRAD 19) is based on the argument that it provides off road parking for parents and reduces traffic congestion in Queen Street as well as making it safer for children. There is no evidence that this will be the case since many parents will still walk their children to school. With no parking in front of the school the speed of transport will go up thus potentially increasing the risk of accidents. Furthermore, car parking at the rear of the school together with the new housing development will lead to another congestion point at the junction of the Mill lane and Queen St.

There is no evidence that the team considered alternative solutions to the pinch point outside the primary school. There are at least 2 alternatives which were suggested by members of the public but these have not been included or evaluated.

Option 1. Instead of putting the car park to the rear of the main building, put it in front where the current playground is making a drop off and drive through back on to Queen Street. Instead of a car park at the rear of the site, build a new playground.

Option 2. The second option is to move the school altogether. There is ample space at the high school in Wilby Road for a purpose built primary school. This would bring both schools on to one site, with synergies in administration and maintenance for example. There is ample room for parking and the traffic congestion would be minimal. The road is much wider and the risk of accidents is lower.

This is just one example illustrating the lack of any logical arguments to make the best decision for Stradbroke. The use of Scenario Analysis is transparent and gives everyone the opportunity to understand why specific recommendations are made.

### **3. POLICY STRAD8: HIGHWAY ACCESS AND PEDESTRIAN MOVEMENT**

There are no specific proposals to improve traffic control or pedestrian movement despite having clear opportunity to do so when selecting the preferred sites. The walkway routes in the plan are what exist today and according to the plan will remain so until the end of the plan period 2036.

Site 5 in the Navigus report was favoured by members of the public and would offer alternative footpath and cycle routes through the village as well as reduce congestion around the primary school. If the Neighbourhood Plan team were serious about “enhancing the Walkway Routes” then why was this site rejected. It is the only submission which would make possible foot and cycle access from the north of the village right through to other core facilities such as the Community Centre, the Swim and Fitness Centre, the High School and the Doctor’s surgery.

### **4. SITE SELECTION POLICIES – STRAD 16, 17, 18, 19, & 20**

There were 13 sites submitted for development, out of these five have been chosen. I can find nowhere in all the documents submitted a reasoned argument for choosing these sites over any other. There is no rational argument why one site is better than another or why any should be excluded. The only common factor I can find in the rejected sites is that one or more of the Neighbourhood Plan team would have been negatively affected. NIMBYism seems to have been the principle criterion for selecting sites and not a thorough analysis of the pros and cons of each site.

The 5 sites identified extend the village in the four directions of the compass and will increase congestion and pinch points in the village contrary to Policy Strad8 above. As the village expands outwards, so fewer people will walk to the centre and traffic flow will increase. Most households have 2 cars and one could therefore expect another 300 – 400 vehicles by the end of the plan period. Several of the rejected sites would have reduced the need to drive to the centre by developing sites within the interior of the village. Sites 5, 6 and 12 in the Navigus report would have retained the overall shape of the village and provide easy foot access to all the amenities. I repeat again there is a complete lack of transparency as to why one site is chosen over another.

### **5. POLICY STRAD15: RETAIL PROVISION**

I totally agree with the need to provide additional retail outlets. The logical approach would be to concentrate these towards the centre of the village, thereby maximising footfall and give all businesses a chance to develop a profitable business. However with development concentrated on the perimeter of the village retailers are less likely to want to invest. Furthermore residents will not want to travel to different locations within the village to do their shopping. There were sites, which have been rejected, that would have been much more favourable to the concept of centralising retail outlets.

Again there is no reasoning given as to why these decisions have been made.

### **6. Integrity of the Neighbour Plan Committee**

Finally, I question the integrity of some members of the committee on a number of grounds:

1. Members of the committee have been seen inspecting “chosen” sites along with what appeared to be developers, before the plan has been agreed?
2. A member of the committee has been to the primary school and announced to parents that the development of a car park to the rear of the building is a “Done Deal”. This is completely out of order, is unethical and compromises the basis on which the Neighbourhood plan should be built.
3. I have received a copy of a letter from a landowner and a local builder about how communications between them and the Neighbourhood Plan team ceased abruptly, with no explanation or reason, despite having positive feedback in the consultation process (see photocopy of letter sent with the permission of the authors). My argument is not about the suitability of the sites in the document, but about the manner in which the Neighbourhood Plan team refused to have any more communications with them.
4. Minutes of meetings by the committee, which had previously been posted on the village website ceased in July 2017. It was only when this was brought to the attention of the Parish Council in November that minutes started to be published in an ad hoc way, despite the committee having regular monthly meetings.



These minutes had little or no content and give little or no detail of the discussions taking place. When challenged on the content, the response was “for reasons of confidentiality”! A full set of minutes were only posted after the last consultation stage.

In conclusion I do not believe the plan in its current form should proceed to the referendum stage. Consultation in the last year has been sacrificed in the haste to deliver the plan, site selection has not been rigorously scrutinised, there has been a lack of transparency in the whole process, and finally, I believe some members of the committee may have behaved in an unscrupulous manner.

Yours Sincerely

**NB: To see a copy of the ‘letter as an attachment to my response’ please refer to the Reg 14 consultation response submitted by Mr Lee (S R Lee Builder Ltd) which appears under ref # LO2 within: [Consultation Statement Appendices E to H](#) (on pages 54 - 55)**

## SBK-9 Deatker (Resident)

By e-mail

Dated: 22 May 2018

To: BMSDSC Community Planning

Subject: Stradbroke Neighbourhood Plan Comments

Hello,

Attached is a completed response form with comments to be included in your review of the proposed Stradbroke Neighbourhood Development Plan 2016 - 2036.

Please will you acknowledge receipt of this email.

Regards,

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Deatker
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

### Section Two: Your representation(s)

To which part of the document does your representation relate? *(You may wish to complete a separate form for each separate representation)*

Paragraph No.		Policy No.	STRAD18
---------------	--	------------	---------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

I oppose Policy STRAD18 in its current form as I believe it does NOT comply with one of the Basic Conditions as required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990.

That sub-paragraph (2) states in part:

(2) A draft order meets the basic conditions if—

(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,

As the current form of STRAD18 will be highly detrimental to the setting of a listed building, I believe it does not meet this basic condition.

The house known as Timbers, New Street, is described in its listing as a “Former Farmhouse. In 2 main sections: a C15 range parallel with the road and to the right a late C16/early C17 2-cell cross-wing.” Not only is it the character and history of this building that is of a farmhouse, but also its setting which has for hundreds of years overlooked open farmland both front and rear. And this setting works both ways. For anyone approaching Stradbroke by road from the direction of Horham, then Timbers is one of the first buildings that can be seen in the village, and it is visible across open farmland from over a quarter of a mile away.

The STRAD18 development is proposed to be directly opposite the entire southern frontage of Timbers (and that of the neighbouring non-listed Green Oak) which will completely spoil the setting of this listed farmhouse and will detract from the historic character of the approach to this end of the village.

*(Continued on sheet 4)*

Continued from sheet 3.

A photo below shows Timbers, and is taken from approximately a quarter of a mile down the B1117 towards Horham. In the winter, or when crops are less tall than they currently are, the view of the house is even more dominant. The second house in the photo, further to the right, is Fig Tree Cottage which is another listed building.



On this approach to the village, both would be completely obscured from view by the proposed STRAD18 development.

## What improvements or modifications would you suggest?

When the development of this site was first mentioned in village meetings, it was discussed as an area behind the existing southern boundary of the New Street Close houses, similar to the amended sketch below. The only frontage onto New Street was a new access road running immediately beside the existing western boundary of the New Street Close houses, and without any new builds along this access road.



I would support this amended version of the development as it is far less detrimental to the setting of the existing buildings, whilst still providing an area for the development of new housing and also the benefit of increased community centre land.

The access road from New Street, positioned as shown above and without houses or hedgerow screening along the first part of it, is of much less impact than the version that has been submitted in the plan.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

*Please be as brief and concise as possible*

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	✓

Signature:

Date: 22<sup>nd</sup> May 2018



Under Regulation 15, Basic Conditions, Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011), sub paragraph (2), a draft order meets the conditions if- (d) the making of the order contributes to the achievement of sustainable development

- Sustainable Development is defined by the National Planning Policy Framework (NPPF)
- 
- “Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning.
- Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future.”

**Developing Land South of New Street does not meet these conditions for the following reasons:**

- 1. It does not retain the character of the village (PL2) but encroaches onto prime agricultural land that should remain in agriculture.**
- 2. in 2003 AECOMM, advised that the land South of New St was unsuitable for development due to drainage / flooding issues. No new drains have been, I believe, installed so why now in 2018 has the land been deemed acceptable for development?. From the Stradbroke Neighbourhood Plan SEA Screening Report Jan 2018. 4.13 Surface water flooding has the potential to affect or be exacerbated by development, particularly where the tributary at the eastern and north-eastern areas of the main settlement runs adjacent to the site allocated on land south of Mill Lane (Policy STRAD18); the site with planning permission on land at Grove Farm (Policy STRAD19); and through the land allocated to the south of New Street (Policy STRAD15).**
- 3. It does not mitigate and manage critical highway pinch points (PL3) but creates additional hazards to those that currently exist now. Namely a new access road onto the B1117 with the attendant increase in vehicle traffic from a potential new development of 43-60 dwellings onto a road that is already busy, where the 30mph speed limit is frequently ignored, currently without pavements and at the B1117 's narrowest point.**
- 4. The existing community land comprising the playing fields adjacent the Leisure and Community Centre appears ideally suited is for village needs so why is more community land required? If it were required then why might it be contingent on additional housing being built.**

*Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

- 1. Any building within the village should be by infill rather than extension into existing agricultural land**
- 2. Priority should be given to reduce the existing traffic pinch points associated with the cross roads and Primary School by selecting potential areas for development such as site 7**

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.



Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

***Please be as brief and concise as possible***

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	

**Signature: signed electronically**

**Date: 23 May 2018**

## SBK-11 Hand (Resident)

By e-mail

Dated: 30 May 2018

To: BMSDSC Community Planning

Subject: Letter RE: Stradbroke Neighbourhood Development Plan

28<sup>th</sup> May 2018

Stradbroke NP Consultation  
c/o Mr P Bryant  
Spatial Planning Policy Team  
Babergh & Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
IPSWICH IP1 2BX

Ref: STRADBROKE NEIGHBOURHOOD DEVELOPMENT  
PLAN.

Dear Mr Bryant

With regard to the Neighbourhood Plan, we write to reinforce our comments made in our letter dated 18<sup>th</sup> February 2018 (copy attached) and to endorse other objections that have been made.

We note that both our property and the neighbouring cottage (Wheat sheaf Cottage) are not shown on the plan as listed when in fact they are both Grade II listed properties. If development of Site 7 goes ahead it would encroach not only

on a Conservation Area but also one of the most historic areas of the village.

Further to the points made in our previous letter we would like to add the following:-

a) Due to the increased volume of traffic and the ever increasing size of the agricultural/commercial vehicles using Queen St, as well as the noted pinch points of the road, we are experiencing damage to the pavement in front of our property (approx 50mm from our front gate) where vehicles are having to mount the kerb to pass one another. This not only detracts from the look of our property and negates the work we had carried out to install a dropped kerb, but in turn is causing a safety issue as not only has it become a trip hazard it is also forcing disabled wheelchairs users and people with pushchairs to use the road.

b) Again on a safety note the increase in volume and size of vehicles has led to an increase in noise levels, which at times exceeds 85dBA or level at which consideration should be given to ear protection whilst in the area for any length of time. Added to which the increased levels of pollution, especially from queuing traffic has also become a health issue.

c) We note that an article in the local paper dated Thursday 25<sup>th</sup> January 2018 reports that Stradbroke Parish Council unanimously agreed to recommend refusal of a planning application to build 110 new homes on land north of Westhall for all the same objections that apply to this development.

d) Another point that should be raised is the pungent and cloying smell that is sometimes emitted from Spillars Pet Food factory which at times not only pervades the garden but indeed our property, has there been consideration given to how it would affect the residents of the proposed new homes on Site 7.

As Queen St was never intended for the size and volume of traffic it now supports it would seem ludicrous to compound the serious problem that already exists by going ahead with the development of Site 7, given that the Grove Farm development has already been approved and that other sites proposed would have far less impact on neighbouring properties and the character of the village. In fact it would appear that the more suitable sites have not been used to their full potential.

We trust that these issues will be given serious consideration as to the suitability of developing Site 7.

Yours sincerely

NB: To see a transcript copy of respondents letter addressed to the Stradbroke Parish Clerk dated 18 February please refer to their Reg 14 consultation response which appears under ref # RO7 within: [Consultation Statement Appendices E to H](#) (on page 32)

## SBK-12 Lee & Stones

By e-mail

Dated: 1 June 2018

To: BMSDSC Community Planning

Subject: Consultation - Stradbroke NDP Reg 16 Submission Doc

FTAO Paul Bryant / Robert Hobbs  
Re Stradbroke NDP Reg 16 Submission Doc  
May 31<sup>st</sup> 2018.

Dear Sirs,

I am writing on behalf of myself (Steve Lee [REDACTED]) and Nick Stones [REDACTED] regarding the Stradbroke submission.

In order to avoid unnecessary repetition we feel the easiest way to make our representation to the District Council is to attach our objection dated 2<sup>nd</sup> March 2018 addressed to the Clerk to Stradbroke Parish Council and the reply received dated the same day.

No further correspondence has been received by us either in response to the comments made or the evidence requested for the decisions taken by those preparing the plan. A small boxed comment has been made in the submission which you will be aware of.

We feel therefore that the plan does not conform with the process set out.


We have both previously felt that the correct path to take is to work through the process with those preparing the plan as opposed to making an application ahead of implementation. However, the way it has been conducted means that we are now putting documentation together ready for a pre-app meeting with the District Council to discuss possibilities for development of the Cottage Farm site accessed from Meadow Way. We know this site can provide good quality development which has the potential to meet all relevant criteria and is suitable for the needs of the village of Stradbroke. Notwithstanding this we have been offered no sound reason for it being dropped from consideration at a late stage in the process.

Please could you acknowledge receipt of this representation, thank-you.

Yours faithfully,

**NB: To see a copy of respondents objection dated 2<sup>nd</sup> March 2018 addressed to the Clerk to Stradbroke Parish Council please see under ref no LO2 within: [Consultation Statement Appendices E to H](#) (on page 54)**

**NB: A copy of the e-mail confirming receipt appears below:**

 Fri 02/03/2018 10:22  
Stradbroke Parish Council <StradbrokePC@outlook.com>  
Responses to consultation on Draft Stradbroke Neighbourhood Plan  
To:  Steve

Thank you for your representation(s). This correspondence is confirmation that your representation(s) has been registered as duly made and will be reviewed by the Neighbourhood Plan Group on behalf of the Parish Council at the end of the consultation period.

Responses to each representation will be detailed in the Consultation Statement that will be published on the Parish Council website once the Plan is submitted to Mid Suffolk District Council.

Regards  
Odile Wladon  
Clerk  
Stradbroke Parish Council

## SBK-13 Lilley (Resident)

By e-mail

Dated: 29 May 2018

To: BMSDSC Community Planning

Subject: Stradbroke-NP-Rep-Form

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Lilley
Job Title (if applicable):	Redacted
Organisation / Company (if applicable):	
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

## Section Two: Your representation(s)

To which part of the document does your representation relate? *(You may wish to complete a separate form for each separate representation)*

Paragraph No.	13) Proposals Plans	Policy No.	Pages 52 & 53
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Do you support, oppose, or wish to comment on this paragraph? *(Please tick one answer)*

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Reference: Proposals Plans Pages 52 & 53 – for 284 new properties.

Strad 19 development: heavily impacts Queen Street traffic pinch point outside the school by increasing vehicle numbers passing through this area. The road is currently not fit for purpose or the volumes and will become a serious point of gridlock going forward.

*(Continue on separate sheet if necessary)*

What improvements or modifications would you suggest?

Strad 19 development: should be accessed from a new road to New Street, or from one behind Skinners factory, through to Ash Plough.  
Better still move the properties away from this area to other sites.  
There are now other development plots available on the outskirts of the village, such as Neaves Lane & land North of Westhall.  
Which have arisen since the village plan was created that is better suited, logistically, for those properties from this development.  
Enabling the heart of the village to remain clear to traffic flow.

Any Queen Street access should be purely for the factory and the proposed new primary school car park area at the back of the school.  
The new school car park should also include visitor parking. Plus capacity for residents who currently have to park on Queen Street.  
This would then enable a no parking ban on Queen Street from the Antiques centre up to the Factory.

*(Continue on separate sheet if necessary)*

Stradbroke NP Submission Consultation (Apr - May 2018)



To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Page 24	Policy No.	POLICY STRAD6: EDUCATION AND HEALTH INFRASTRUCTURE
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Reference: Education & Health Pages 24 & 25 – for 284 new properties.

Strad 6: The plan does not provide acceptable detail regarding the impact that the additional residents to the village will have.

Education:

The new children needing primary & secondary school places – is there spare capacity – NO?  
Will the additional classrooms, facilities and teachers be in place once the new houses are occupied – NO?  
How long will it take to extend the schools or even move the primary school – YEARS? Too late for the new residents.

Health:

The new residents will need access to the Health Centre - is there spare capacity – NO?  
Will the additional space, facilities, doctors and nurses be in place once the new houses are occupied – NO?  
The current Health Centre would need to be extended – which is feasible. To build a new one in the village is a long-term project and not a viable solution short term.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

It is vital that the schools, health centre, the Stradbroke Trust and other interested parties, are consulted immediately. So initial plans can be prepared, including budgets and timeframes. This cannot wait until these developments are completed.

The schools and the medical centre along with county council and support from our MP is needed to ascertain what grants and funding can be levered to help fund these critical projects – NOW.

(Continue on separate sheet if necessary)

Stradbroke NP Submission Consultation (Apr - May 2018)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	STRAD7: Community Infrastructure
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Reference: Community Pages 26 – for 284 new properties.

Strad 7: The plan does not appear to mention the Leisure Centre?

This is a unique and superb facility for a village the size of Stradbroke.  
Currently the swimming pool is far too small for the existing members and would be used more by other residents if larger.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

With a minimum of 284 new residents coming to live in the village the Leisure Centre will be far from being adequate.  
Has there been any consultation with the owners, management & Stradbroke Trust – if so should this not be included in the Village plan.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Dependant on the number of responses and comments received.  
If there are a lot of responses about the same item in the plan then it would be useful for the Examiner to discuss the key concerns.

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	Yes
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	Yes

<b>Signature:</b>	<b>Dated: 29.5.2018</b>
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## SBK-14 Merritt – 1 (Resident)

By e-mail

Dated: 22 May 2018

To: BMSDSC Community Planning

Subject: Stradbroke Neighbourhood Plan response

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Merritt
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

**Section Two: Your representation(s)**

**To which part of the document does your representation relate?** *(You may wish to complete a separate form for each separate representation)*

<b>Paragraph No.</b>	Pages 15,23,28	<b>Policy No.</b>	
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

**Oppose**

**Please give details of your reasons for support / opposition, or make other comments here:**

**Please be as brief and concise as possible**

I believe the integrity of the plan, re housing sites has been compromised, it was reported that a Neighbourhood Plan committee member had said at a Primary School parents meeting prior to completion of consultation that acceptance of the Mill Lane site was a 'done deal' suggests that outcomes had been pre-determined prior to conclusion of consultation.

A car park at Mill Lane (rear of Primary School) would not alleviate Queen Street congestion as parents would still need to use the street to access/leave car park via Mill Lane. There is no evidence that alternative solutions were considered. ie High School site.

Recently the Parish Council, in a closed session, voted funds of £2000 from parish precept to fund a legal challenge to a proposed housing site, West Hall, located in proximity to approved Grove End site. West Hall has not been recommended by Neighbourhood Plan as a preferred site, why ? The secrecy surrounding of this transaction questions the motivation and integrity of the association between the Parish Council/Neighbourhood Plan.

On the basis of the above comments I am unable to support the Neighbourhood Plan as I believe it lacks process integrity

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

**Please be as brief and concise as possible**

Subject the selection process of Mill Lane site to public scrutiny.

Examine alternatives to alleviate Queen Street congestion.

Ask Parish Council/Neighbourhood Plan Committee reason for a closed meeting to seek funding of £2000 to influence West Hall site application.

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary. Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

*Please be as brief and concise as possible*

My areas of concern described above could be publicly answered/explained and confidence restored in the plan.

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	yes
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	yes

Signature:	Date:22/05/2018
------------	-----------------

## SBK-15 Merritt – 2 (Resident)

By e-mail

Dated: 1 June 2018

To: BMSDSC Community Planning

Subject: Stradbroke Neighbourhood Plan

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Merritt
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

### Section Two: Your representation(s)

**To which part of the document does your representation relate?** *(You may wish to complete a separate form for each separate representation)*

Paragraph No.	10/11	Policy No.	

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support

Support with modifications

Oppose

Have Comments

**Please give details of your reasons for support / opposition, or make other comments here:**

The Stradbroke Sports and Community Centre (SSCC) was identified in the original questionnaire as being highly valued by the Community along with the Swim and Fitness Centre. At the time we were consulted by the original Neighbourhood Plan team and our opinions sort. At no time since the resignation of this team and the subsequent formation of a new Neighbourhood Plan team has the SSCC Committee been asked for any input. It is stated that they consider the Centre should be marketed as a meeting place for businesses – how can this be possible when Centre is used on a daily basis by fitness and other clubs? There is just not the room available for such a facility and no suggestion of how this could be achieved.

The new Neighbourhood Team also suggest that the Playing Fields should be expanded, enabling dog walkers to use this addition. The Parish Council have recently said that the Playing Fields and adjacent Play Area are a 'dog-free' zone. This is contradictory and against Health and Safety guidelines.

A lot of hard work was undertaken by the original Team, which has subsequently been ignored by the new Team, with changes to preferred development sites and no provision taken into account for young children and teenagers - their views seemingly being ignored. They are the future for Stradbroke.

I am asking that you do not support this current Neighbourhood Plan.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible*

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

*Please be as brief and concise as possible*

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	X

<b>Signature:</b>	<b>Date:01.06.2018</b>
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## SBK-16 Passmore (Resident)

By e-mail

Dated: 1 June 2018

To: BMSDSC Community Planning

Subject: Representation Form - Stradbroke Neighbourhood Development Plan 2016 – 2036.

Dear Sirs,

Please find attached my response to the Stradbroke Neighbourhood Plan that has recently been published; in addition to this electronic document, my letter, which is the basis of my commentary has been sent by registered mail to Mr Paul Bryant with a guaranteed delivery time of 1300 hours, tomorrow, Friday 1<sup>st</sup> June, so that the required deadline is met.

Thank you for your attention.

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Passmore
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

## Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	STRAD 5, 7, 9, 18, 19
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

*Please be as brief and concise as possible*

Hard copy of the following, but directed to the personal attention of Mr Paul Bryant as indicated above, has been despatched with a guaranteed delivery time at his office by 1300 hours, Friday 1<sup>st</sup> June 2018.

30<sup>th</sup> May 2018

Stradbroke Parish Neighbourhood Plan 2016-2036

Dear Assessor,

Further to the publication of the above, I trust that it will be agreeable to you to accept my comments in the form of this note; the reality is that it has not been easy for me to formulate what I believe to be a coherent response using the forms that have been provided and therefore I kindly request that you accept this note and, within it, the reasons why it seems to me that the Plan is flawed and should be rejected.

**Background:**

For information, and in responding to the previous two documents to which comments were invited, my responses (both in October 2017 and February 2018) concentrated on the following factors relating to:

1. Traffic Volumes in Queen Street
2. The "Choke Point" in Queen Street outside the Primary School
3. The Queen Street Junction adjacent to the Skinners' Plant
4. Queen Street Site – Land to the South of the Skinners' Plant (which is to the rear of our listed property).

In both responses, I queried, very specifically, the location of the Primary School and whether the current location of the school had been assessed, openly and without prejudice, as an essential criterion in the overall development of the plan?

In the event, and as subsequent iterations of the Plan were presented, it is evident that little if any attention has been given to these points; from the standpoint of reasonable "due process" this is surprising and disappointing.

**Policies:**

1. STRAD 5: EDUCATION AND HEALTH INFRASTRUCTURE
2. STRAD 7: HIGHWAY ACCESS AND PEDESTRIAN MOVEMENT
3. STRAD 9: PARKING PROVISION
4. STRAD 18: LAND SOUTH OF MILL LANE

## 5. STRAD 19: LAND AT GROVE FARM

My principle comments relate to a mélange of the above and I remain concerned, indeed staggered, that consideration of infrastructure issues and especially the capability and capacity of the road system to cope with the changes proposed are not being accorded the high profile that is required.

My property is a Listed Building on the edge of a Conservation Area and since my wife and I arrived here in Suffolk, we have invested significantly both in the structure of the house and its grounds to restore the building appropriately and to develop a suitable ambience for such an old property.

The view across the fields to the rear is a key and agreeable feature (as it is to neighbours with listed homes) and any development of this area, would provide a regrettable intrusion into and blight on the countryside not to mention providing further tangible evidence of "urban sprawl"; further it would unquestionably have a negative impact on our home (an image of which has been included in the draft plan (without any consent on our part, which is both surprising and unfortunate).

Personal considerations apart, and having analysed the information, please note the following:

### 1. Traffic Volumes in Queen Street

During the last 37 months, since we moved to Stradbroke traffic volumes have increased not insignificantly; it is not just in the number of the vehicles using the road, but in their character. Daily, sizeable agricultural machines (modern JCB Fast Track or equivalent with 17 tonne trailers) use the road, and all too often at speeds of 40 mph and more, notwithstanding the speed limit and the 20-mph advisory limit by the Primary School; indeed, and when there was no school traffic, in the week commencing 16th October 2017, a 15.6 metre (51') skid mark appeared outside No. 2 and Wheatsheaf Cottages when one such machine was close to causing an accident.

Other agricultural machines which, from time to time, use this road include combine and sugar beet harvesters and there is no scope to widen the road.

Looking at more general Commercial Traffic, the number of large articulated lorries and trailers is not diminishing, and it has been acknowledged that these volumes will continue to increase.

As a result, potentially dangerous situations arise all too often – the lack of / failure to impose speed restrictions is unfortunate and the potential consequences are self-evident.

### 2. Queen Street including "Choke Point" (outside the Primary School)

Notwithstanding thoughts that a car park to the rear of the existing school could, eventually be provided, it should be noted, and it must be recognised that the width of the road in Queen Street varies considerably. Rough measurements indicate that the road is 5.5 metres wide outside No. 2 Cottage; this increases to 6.5 metres outside my property; it is, however, just 5.9 metres outside Sunnyside, which has no off-road parking – for much of time, therefore, the width at this point is reduced by at least a car's width.

It must be emphasised that there is no scope to widen the road and whilst much of the focus around this area concentrates on the challenges during term time and the ingress and egress of people to and from the Primary School itself (of course, the arrival and departure of School buses do add to the traffic chaos), it is the case that the pressures remain in this area at other times as well). It is, absolutely *not the case* that it is only during school opening and closing times that the traffic pressures arise, albeit these are no question that at these times they can be exacerbated.

Further, with the site of the former Service Station now being redeveloped this will add to the traffic volumes and local congestion in Queen Street

### 3. Queen Street Junction by Skinners' Plant

There are several points of a concerning nature that need to be articulated; these include:

- a. It is understood that the site of Grove Farm has planning permission for an additional 44 dwellings – assuming a mean of around 1.5 vehicles per property, this implies around 60 - 70 further vehicles, the use of which will need to be absorbed within the existing road system. All the traffic from this development will impinge on the above junction, and this is but one of the developments that is proposed.

- b. Looking at commercial traffic and following the recent expansion of the business at the Mill, the volume of heavy lorries, and particularly articulated vehicles with their trailers has unquestionably increased and anecdotally, it is understood that if the anticipated growth plans for the business are realised, then axiomatically the volume of this commercial traffic will continue to increase. (On a related point, is it the case that additional residential premises so closely adjacent to an expanding industrial site should be considered?)
- c. If a Car Park to the rear of the School Playing Field was to be provided, and the school population increases by around 50 pupils, then a substantial number of vehicles would use this facility including, school buses.

#### 4. Land to the South of Mill Lane

Any combination of the above point to an increase in number of vehicles that would have to use the Queen Street Junction by Skinners' Plant and therefore potentially to much increased congestion on a road system that is already stressed.

The width of Mill Street is just 6.1 metres and the limitations that this affords for articulated lorries going in and out into Queen Street should be self-evident; further any rational consideration of these points confirm the view that the junction of Queen Street / Mill Street will not be fit for purpose to accommodate the volumes of traffic

Thus, it does seem incredible - even illogical - that there seems to be such concentrated focus on putting more pressure on to Queen Street both in its main thoroughfare and the junction with Mill Lane. It is hard not to conclude that the issue of the chronic situation in Queen Street, with the health, safety and welfare issues that are manifestly apparent, have been set to one side as other short-term aspirations have been pursued – it is only reasonable that fuller and more rational explanations are provided.

#### 5. Location of the Primary School

In my submission of October 2018, I asked, very specifically, the following,

*"In terms of the Primary School, has consideration been given to the development of a new school on another site, and if not, then why not? Precedents such as recent closures of schools in Coddenham and Mendlesham demonstrate that this is possible. Considerable grants and funding are available for proactive and creative thinking – has the possible re-location of the school, the sale and re-development of the site of the existing Primary School been considered, and if not, then why not?"*

I commented further that,

*"It has been brought to our notice that during recent meetings at the Primary School the week before last (this was in October 2017), parents of children attending the school were given the distinct impression that the development of Site 7, with "the provision of 75 dwellings" were, seemingly a "done deal" – the only reasonable reaction is that comments to this end, no matter whether they were deliberately intended or not, were, and indeed, are, utterly inappropriate. The fact that this impression can have been provided should be a matter of grave concern; indeed, it must be the case that any such assertion (not matter how deliberate or otherwise) points to prejudice and pre-determination and from a legal standpoint this must, at the very least, be doubtful."*

This would imply that the current location of the Primary School has been "ring fenced" in the development of this outline plan and anecdotally, I have learned from previous members of the Parish Council that this is the case. Therefore, the opportunity to explore the opportunity of providing the locality with an up to date, modern and environmentally friendly school with a reasonable and appropriately sized playing field (which would provide scope for the development and enjoyment of better physical training and a healthier education in line with government policies) has been avoided.

It must be germane to ask about the location of the Primary School and why other locations, for example adjacent to Stradbroke High School or in other locations where access would not, remotely, be as difficult as it is now, or will be if the proposed changes are permitted; has this been a consideration, and if not, why not? The Primary School's future location should be a seminal

factor and should be scrutinized thoroughly and in great detail.

Additional factors in terms of schooling in the Village that should surely be borne in mind are:

- High School Facilities – there are a range of high quality facilities at the High School which could be put to better and more efficient use if shared by a combination of the Primary School and the High School
- Mode of Transport to and from School – despite comments about the provision of, for example, additional walkways, the reality is that more and more, parents choose to convey their offspring to and from school by using their private vehicles.

#### **Additional Inputs:**

The above notwithstanding, with its concentration on the policies outlined and related issues, I also draw your attention to the following considerations:

#### **1. Objectivity and Efficacy of the Neighbourhood Plan Committee**

As indicated, in October 2017, at a Parents' Evening at the Primary School, a Parish Councillor (Councillor Christopher Edwards) advised parents that the development of STRAD 18 was a "done deal"; since then, he has commented that:

- There is already an "architectural design" for this development
- That the drainage of the site will be changed so that surface water will flow "in the opposite direction" (viz, from East to West) and that to achieve this, "millions of tonnes of soil can be moved very quickly
- That the Grove Farm development will not happen!

Further, he has escorted different groups of visitors around the Site (a recent occasion being on 15<sup>th</sup> May 2018 at around 1130 hours when he was one of a group of six).

Surely such actions cannot be justified under any circumstances; they can only be seen as prejudicial and unprincipled and seem redolent of someone with a personal agenda.

#### **2. Due Process**

From the above, it will be seen that I am profoundly concerned about the myopic and limited approach in the process of developing the Neighbourhood Plan; it really does seem that instead of "appreciating the situation", with open minds and a sense of objective purpose, quite the reverse has been the case, namely "situating the appreciation", and therefore the outcome, so that a range of limited and potentially self-serving outcomes emanate. This approach is wholly at variance with the manner in which processes like this should be pursued.

#### **3. Site Selection**

In total, thirteen sites from development were promulgated; in the event, five of these have been put forward and as well as providing albeit without any accompanying rationale as to why these have been chosen and the others ruled out.

Overall, it is hard not to conclude that the real driver in the development of the plan has been principally by the perceived need to add residential dwellings to the village and that a golden and real opportunity to think "out of the box" on a much broader basis in the development of a radical plan for the village has been missed.

Broader infrastructural issues must merit and surely demand detailed and objective analysis within the overall planning process and how the variety of retained agencies in this process appear not to have contributed to these matters is hard to comprehend.

I trust that the above will now be accorded reasonable and principled consideration; for the moment, I must express my strong opposition to the plan in its current form.

Yours sincerely,

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible*

In the light of the above, a wholesale review of the plan in its current form is surely required, with a reliable and independent process which will be:

- All inclusive
- Detailed
- Objective

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

*Please be as brief and concise as possible*

A hearing that concentrates on the future of the Primary School, and more generally, educational facilities within the village of Stradbroke seems to be needed. This should surely be just one element of a broader consideration of the future of the village.

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	Yes
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	Yes

Signature:	Date: 30 <sup>th</sup> May 2018
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## SBK-17 Rennie-Dunkerley (Resident)

By e-mail

Dated: 25 May 2018

To: BMSDSC Community Planning

Subject: Stradbroke NP Response

Dear Paul

Please find attached the Response Form plus an attachment with a more detailed response for the NP Examiner.

Kind Regards

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Rennie-Dunkerley
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

### Section Two: Your representation(s)

**To which part of the document does your representation relate?** *(You may wish to complete a separate form for each separate representation)*

Paragraph No.		Policy No.	

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support     Support with modifications     Oppose     Have Comments

**Please give details of your reasons for support / opposition, or make other comments here:**

*Please be as brief and concise as possible*

**Please see attachment**

*(Continue on separate sheet if necessary)*



**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible*

**Please see attachment**

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

*Please be as brief and concise as possible*

There has been insufficient consultation, a lack of available evidence and subjective lobbying by a member of the NP group as opposed to an open and objective approach.

Please see attachment for details

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	Yes
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	

<b>Signature:</b>	<b>Date: 25.5.18</b>
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**Response to Stradbroke NP Consultation Document**  
**Addendum to Consultation Response Form**  
**May 2018**

1. Forward. 'Community-wide responses.....Policies are there to deliver the community's ambitions'

The 1st survey was rigorous, anonymous and incorruptible as each respondent had a unique code so it could only be completed once. The NP committee at the time worked with CAS to develop this secure survey that, as a result, was efficient, effective and accurate. Each household was given a copy personally by one of the team of volunteers who helped householders where needed and collected the survey if there was a difficulty in returning it. Prior to the survey there was blanket coverage and publicity including articles, posters and a large banner above the Spar shop.

The 2nd survey was virtually non-existent. The vast majority of residents did not know it was taking place until too late. There was scant publicity and respondents had to be pro-active. A substantial number of elderly residents do not have access to the internet and would not be willing or able to make a special effort to go to the library where they would have to go through all the documents and complete a paper copy. We made a particular point of home visits for those people in conducting the first survey. Their voice has now been ignored.

2 posters only appeared in the village on the day of the deadline so not seen by residents. One resident wrote a full response to the consultation process suggesting at the time that it was rushed and not open to

all. The reply from the NP committee was that they were 'adhering to deadlines set by MSDC' which is not accurate.

The 2nd survey was conducted on SurveyMonkey that is open to corruption and was proved to be so by some people testing the system. It was very easy to enter multiple entries with no security checks. As such, any results are null and void as a large number are fictitious.

However, no evidence from this survey appears to be available yet policies and site allocations have been written in this document. This suggests that the NP committee have made decisions about the sites rather than residents and have hoped that it matches general opinion. This goes against the aim of an NP and the sentence quoted above. The NP committee need to be reminded that they are merely an objective conduit of information that is true and accurate and not at liberty to manufacture policies. It appears that Policy Strad1: Development Strategy and Principles is dubious in its content as it is not based on full and accurate evidence but the opinion of a few.

At the very least this survey needs to be repeated using a secure system after full publicity and access to it followed by open and clear evidence.

2. The Village Design Statement. 'If there is further expansion.....very effective and influential linear form is retained.' (2003)

This document is now 15 years old and the research behind even older and contains some subjective views. It has not been tested by reference to the resident opinion/consultation in the preparation of this document. It is stated that the VDS was up-dated and approved in 2014 but by whom? This was not shared with the village nor does it appear on the MSDC website (unlike Eye's, for example). Again, if it is to be used as evidence, this needs to go to consultation with all residents and then shared with MSDC.

3. Policy Strad1: Development Strategy and Principles

Where is the evidence that the 5 sites allocated are the genuine sites? Some of these are in direct conflict with the original village responses in the first survey/questionnaire and have not been flagged up as high priority sites by AECOM eg Land North of Laxfield Road. Others have been dismissed not because of major problems highlighted by AECOM but by a decision made by the current NP committee without solid backing from the village or a clear rationale.

With such important decisions to be made it is vital that Stradbroke residents are given as much information/guidance as possible. An effective way would be in the form of scenarios highlighting pros and cons of all the sites indicating all the extras that the village would gain from each eg Site 5 is partially a brown field site that has its advantages and would open up a series of pathways especially if linked to the back of the primary school....and so on. None of these scenarios were put forward to allow residents to think creatively and widely and with a full set of options

There is particular concern as a member of the current NP committee/Parish Councillor has contacted 2 of the landowners in this list of 5. He tried to persuade one to develop his land to build 45 houses instead of the 9 that he is asking planning permission for. He tried to persuade another landowner that if he agreed to certain terms matching the suggestion in the NP for site 2 then permission for houses would be easily and readily granted. The same Councillor attended a meeting at the Primary School in November informing parents that it was already decided that the site behind the school would be in the Neighbourhood Plan and permission granted for development and work on the carpark. Again this was without authority or the mandate of the residents but bull-dozed through. This is clearly unacceptable and manipulating practice again not adhering to the principles and remit of a Neighbourhood Plan.

4. Infrastructure

The 1st survey allowed for feedback from households and businesses on broadband and mobile reception. There was a strong bank of response that has been ignored here yet it was a priority for many.

5. Education

Stradbroke High School (SHS) is one of the smallest high schools in Suffolk with fewer than 250 students. It is not fully utilising all its property and substantial playing fields and has ample opportunity to expand without devoting a parcel of land to it. No evidence is being provided that educational experts have demanded this nor has this been reflected by any evidence from opinion gathering from Stradbroke

residents. It simply appears as an emotive and manipulative move to prevent development on a particular site. No mention has been made of moving the primary school as an option (see 3.)

#### 5. Other Community Provision

It is suggested that 1 'approved' site would allow for expansion of the Community Playing Fields 'to provide .....informal recreation such as dog walkers.' There is a strict rule about no dogs on the Playing/Sports field so where did this idea emerge from? However, another proposed site offers many further opportunities for recreational activities such as circular paths leading to a network of paths around the village for everyone plus a large fishing lake and wildlife observation look-outs yet this has been ignored. Again there is no evidence of residents' response to these sites so we are unable to judge whether this is simply the NP committee's view.

#### 6. Transport and Accessibility

'There has been growing concern.....unadopted roads.' Where is the evidence for this? Which unadopted roads and where is this in any survey and where are the responses?

#### 7. Infrastructure Investment Priorities

There is no mention of the community centre here yet in the 1st survey this scored very highly as an important facility to retain and maintain as part of the village. Over 60% of respondents stated that the leisure centre and the community centre were very important as opposed to less than 40% citing the courthouse and All Saints Church. However, these have been put forward to receive attention/actions/monies. Again is this simply the committee's views on what should receive monies?

#### 8. Community Actions

There has been no public debate or reference to Assets of Community Value and no evidence that there has been dialogue regarding it with both private owners, trusts or organisations. This is yet another idea that has sprung from the NP committee as a wish list without any reference to the community or stimulus from it. Genuine community actions that were clearly pinpointed in the first survey have been ignored.

#### 9. Full Representation

The original questionnaire consisted of 3 surveys: Household, Business and Youth. This draft makes reference to the first but the other 2 appear to have been side-lined yet both contain valuable and insightful points for the future of Stradbroke and lead to various community actions.

Overall, the consultation process has been seriously flawed and statistics skewed. The actual number of residents who have been taken part in the consultation is fewer than 10% of the population simply because they were not kept informed or aware. Minutes of meetings were not posted, publicity was lacking and original documents were taken off the PC website so comparisons could not take place. People were asked to comment on the development sites that the committee had chosen with scant approval. This is not a true representation.

I understand that integrity and objectivity is crucial to a Neighbourhood Plan but these are both seriously lacking in the conduct of the committee. This was such an issue that a majority of members resigned from it leaving a very small group that has run a closed organization indulging in a lack of due process and integrity.

25.5.18

## SBK-18 Turkington (Resident)

By e-mail

Dated: 31 May 2018

To: BMSDSC Community Planning

Subject: Comments on Stradbroke NDP

Dear Paul,

Please find attached your form duly completed and another Word document with my comments. Apologies for not putting these on the form but as I hope you will appreciate the form was somewhat restrictive in respect of the comments I have made.

[Please confirm] receipt of my submission.

Kind Regards

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Turkington
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

### Section Two: Your representation(s)

To which part of the document does your representation relate? *(You may wish to complete a separate form for each separate representation)*

Paragraph No.		Policy No.	
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support     Support with modifications     Oppose     Have Comments

**Please give details of your reasons for support / opposition, or make other comments here:**

*The plan in its current form ignores key evidence from comprehensive surveys of residents*

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

*Open consultation on all sites proposed by landowners/developers*

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

*Please be as brief and concise as possible*

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the NDP by Mid Suffolk District Council	X

**Signature:**

**Date: 31<sup>st</sup> May 2018**

## **Response to Stradbroke NP Consultation Document – May 2018**

1. The overall objectives of the plan would appear quite sensible but there are many generic statements clearly written by someone with little or no knowledge of our village as will be seen in some of the following comments.
2. The original working party were responsible for the all the work that lead to the production of 3 questionnaires (Household, Business and Youth). These were distributed by hand to every home and business and a presentation made at the High School with students then being given time in school to complete the questionnaire. Over 500 responses were returned and analysed. This work which is the most comprehensive data on residents' views and opinions has largely been ignored particularly in respect of site allocations. The development of the plan since the July last year has not been inclusive, transparent and therefore lacks integrity as will be seen from the detailed points below:
  - a. Many of the results of the 3 initial questionnaires (Household, Business and Youth) have not been included in the supporting documentation as this does not necessarily support the Working Party's (WP) views
  - b. The results of the more recent consultation and survey are not included in the supporting document just the WP's summary
  - c. Minutes of the WP formed in July 2107 were not published at the time despite having meetings on a monthly or possibly more frequent basis. Some were retrospectively published on the PC's website but subsequently withdrawn
  - d. The use of Survey Monkey in its native form does not provide the necessary levels of security to prevent multiple entries and hence data corruption. Even if the majority of responses are genuine they are much fewer and in contrast to the original surveys.
  - e. The questions used in the Survey were not open but leading.
  - f. The Village Design Statement 2003 is provided as supporting evidence with together with an updated version of 2012. There is no evidence that this has been published before or consulted on.
  - g. Submissions to the PC under Regulation 14 have been ignored
  - h. Audio recordings and subsequent publication on the village website has been stopped by the PC. Recordings are made but not available to the public. Decisions, therefore, have become closed.
  - i. There have been 12 resignations from the PC during the last 2 years many of whom cited the way the Council was being run.

### **3. Site allocations**

- a. The responses to the Household questionnaire identified 5 of the 10 sites proposed at the time as the most unpopular for future development including STRAD16 and STRAD19. They had 133 and 119 objections respectively yet they are now put forward as preferred sites.
- b. STRAD16 offers no amenity benefit and blocks an important view (identified in the original work) of the entrance to the village from the east.

- c. STRAD19 will not alleviate the traffic problems along Queen Street and most probably will make matters worse if the area is cleared of parked cars the speeds are almost certain to increase whatever legal restrictions may be put in place. The proposed car park at the rear of the school is unlikely to be used by most parents and guardians dropping off their children as it adds significant, albeit small, inconvenience to their journey.  
The provision of a carpark that is of dubious benefit is hardly significant given the potential magnitude of the proposed development of 70 homes.

Consideration should be given to moving the school to a new purpose built facility on the High School site. The old site could then be considered for retail use as there are few, if any, alternative sites in or near the centre.

An additional 70 homes will inevitably generate more traffic and the density of housing seems comparable with that of Ash Plough (land previously owned by the current owner of the site A) and this has been highlighted in the original survey as they type of 'over development' that the village specifically doesn't want.

- d. STRAD17 – why offer land to the High School when there is no evidence that it needs more space even with the possibly increase in student numbers over the next 20 years.
- e. Sites NP5, NP6 and NP11 have not been chosen for development despite general support from AECOM and offering much greater community benefit in respect of new walkways and footpaths and in respect of the latter, affordable housing and a fishing lake – something that was identified as desirable by many in the Youth Survey

- 4. **Affordable Housing** – there is no policy regarding the provision of affordable homes despite this being a major concern among residents. It is also interesting to note that site NP6 is assessed by AECOM as having the greatest economic potential to support high levels of affordable housing but it is excluded from the plan.  
The plan suggests phased development over a number of years possibly with some development on all sites at similar times. This phased approach may lead to developers claiming the affordable elements are no longer financially viable.
- 5. **Retail provision** – there was overwhelming support for improved retail facilities in the Household survey but members of the PC and the current WP blocked an attempt by the Co-op to build a new shop almost opposite the Primary School. The STRAD 15 policy does not offer any sites for retail and suggests that land close to the edge of the village may be suitable. If such a development were to go ahead it would almost certainly spell the end of the retail centre in the village and create further traffic movements within the village.
- 6. **Utilities** – STRAD 4 makes no mention of Broadband or Mobile phone service despite these being of greatest concern in all 3 original surveys and is of great significance in respect of attracting new business and employment. Further evidence that the original work has been ignored

## 7. Amenities

- a. The Sports and Community Centre together with the Swimming Pool and Fitness Centre were identified as the most valued amenities in the village but there is no mention of how either may be supported to expand their range of facilities. Further evidence that the original work has been ignored.
- b. The NP suggests that the Community Centre should market its facilities for business meeting. However, the WP fails to note that the centre is already in use every weekday morning and afternoon and does not have the capacity. Thus further evidence of the lack of consultation and inclusivity and a lack of understanding about how to generate greater business activity and employment in the village.
- c. The NP suggests an extension to the playing field would be an asset to dog walkers – dogs are expressly prohibited on playing fields because of health and safety concerns. Further evidence the document has been put together without proper consultation and/or expertise.
- d. The Stradbroke Trust built the Doctors Surgery and they lease the building to the NHS but there has been no consultation with the Trust, the Doctors or the NHS regarding future provision of health services.
- e. The Tennis Courts are an important facility but the NP claims they are the only ones in the village – not true there are 5 or 6 courts on the High School MUGA (Multi Use Games Area). Public access may be limited currently but if the playing field is to be extended the public courts may be relocated to provide more space for indoor amenity provision. The tennis courts, which are a tarmac surface should not be designated as a green space.

In summary the plan should not progress further in its current form for reasons given above. The views of the majority of residents that have taken time to engage in the project have largely been ignored and one can only conclude that the PC and current WP have vested interests particularly with respect to site allocations.

The results of the original work can still be found on the village website - <http://stradbrokeonline.org.uk/index.php/neighbourhood-plan-surveys?showall=&limitstart=>

30<sup>th</sup> May 2018



## SBK-19 Woodward (Resident)

By post

Received 25 May 2018

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Woodward
Job Title (if applicable):	n/a
Organisation / Company (if applicable):	n/a
Address:	Redacted
Postcode:	Redacted
Tel No:	Redacted
E-mail:	Redacted

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

## Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Policy No.
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible

THE MAKING OF THE ORDER IS NOT IN GENERAL CONFORMITY WITH THE STRATEGIC POLICIES CONTAINED IN THE DEVELOPMENT PLAN FOR THE AREA OF THE AUTHORITY. B1117 (SITE 3) IS NOT SUITABLE / SAFE TO TAKE FURTHER TRAFFIC. (SEE ATTACHED EXPLANATION OF OBJECTION).

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible

DEVELOPMENT OF SITES WHICH IMPROVE ROAD USAGE AND SAFETY.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

For Office use only:

## Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	
---------------	--	------------	--

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible

THE MAKING OF THE ORDER DOES NOT CONTRIBUTE TO SUSTAINABLE DEVELOPMENT AS DEFINED BY NPPF.

- GRADE 3 AGRICULTURAL LAND
- SURFACE WATER FLOODING
- CHARACTER OF VILLAGE
- COMMUNITY FACILITIES

PLEASE SEE ATTACHED SHEET FOR EXPLANATION

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible

DEVELOPMENT SHOULD TAKE PLACE WHERE THERE IS NO RISK OF SURFACE WATER FLOODING.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

## **Stradbroke Neighbourhood Development Plan 2016-2036**

### **Reasons for opposition to building proposal South of New Street. (From SEA screening section 1.7, figure 1.2, site 3)**

**OBJECTION: The making of the order is not in general conformity with the strategic policies contained in the development plan for the area of the authority.**

The proposal for the land south of New Street would have an entry/exit road directly onto New Street opposite the **listed buildings** Fig Tree Cottage, Timbers, and its neighbours. This country road, B1117; outside the building line of Stradbroke **is only 5.2 metres in width**, and there is no pavement on either side of the road.

Given that most houses in Stradbroke have 2 cars, and the plan is for 43 - 60 houses, this could mean that around 100 cars more per day might access this entrance onto New Street where it is narrower than the road further into the village, measured at 6.7metres between pavements.

Exit from properties with no pavement onto this narrow road is already difficult due to **visibility problems** and with the current **volume of traffic**, which include **frequent** fast-track tractors with wide trailers, straw lorries going to the Barley Brigg site, other agricultural heavy lorries and pig transporters passing along this narrow main route into the village.

With an entry/exit road turning onto it from a development and many more vehicles, this could create an **accident hot-spot** in the village.

It would only take one car to park on the road whilst visiting the development (as happens further along the wider road at houses with garages and drives) to create a bottle-neck. **Emergency vehicles** would be unable to access homes and business.

The neighbourhood plan cites in PL1 'improved highways'. In this instance it would be very much worse, especially at harvest time when a number of large sugar beet lorries are on this road from the adjacent fields from dawn and through the day and night.

PL3 of the neighbourhood plan, plans to mitigate highway pinch points. This plan would create **another pinch point onto a narrow road with current 'blind' exits.**

PL6 'promote community safety'. On a daily basis, many villagers use the narrow road to walk, cycle and jog to the footpaths of the village around the fields. This includes elderly and disabled villagers who live at New Street Close bungalows and access the countryside by wheelchair, walking aids and scooters for the disabled. Sensibly, walkers and joggers face the oncoming traffic where there is no pavement. Currently they have to rely on stepping into driveways and narrow verges to get off the road away from traffic which does not allow room for motorist and pedestrian.

The proposed new development would make using the village footpaths at this end of the village a hazard due to increased traffic and possibly **take away a**

village amenity of walking in open country lanes. (PE2, PE4, are also contravened)

### **From Sustainable Development as defined by the National Planning Policy Framework (NPPF)**

#### **The making of the order does not contribute to sustainable development**

Stradbroke is historically a farming community. The use of grade 3 prime arable land for building outside the boundary of the village would compromise the ability of future generations to be a farming community, especially when there are many infill areas available within the village boundary to develop for housing. The natural environment should not be taken for granted; village people are inextricably linked to their agricultural roots.

The SND Plan cites under the heading ENVIRONMENT. (PL6)..."promote community safety, green economy and nurture green spaces."

PL2 speaks to retaining the character of the village.

Currently the Horham Road entrance to Stradbroke is beautiful open countryside. A housing development will mar the rural character of this entrance to the village that is currently a view across the fields of listed buildings and country properties.

A principle of sustainable development requires that community facilities are not compromised. Currently both primary and secondary schools are full; the doctors' surgery is at maximum patient capacity; and the public transport system is infrequent and not currently adequate for the population. Significantly more households of any age will **compromise the ability of public services to cope. Transport and movement will become a greater problem.**

**Surface water flooding** has been a problem noted in 2015 due to high rainfall (page 14 SEA screening report) and again 2018 with significant flooding of ditches and small streams. One home (to my knowledge) along New Street saw surface water almost reach its back door.

Page 14 SEA report talks of the Plateau Clayland Landscape and indicates that the agricultural field cited in site 3, New Street "...surface water flooding has potential to be exacerbated at this site". Indeed, a building survey of 2003 rejected this land for this reason.

#### **Improvements or modifications to the plan which I might suggest.**

The main problem within Stradbroke which calls for development is that of Church Street; particularly in relation to vehicles parking to pick up school children and drop them off. Moving this traffic off the road would improve the village for residents.

Development should be undertaken where there is no flooding risk to new homes.