

Thank you for providing details of the Suffolk Coastal District Council First Draft Local Plan consultation.

The comments from Tuddenham St Martin Parish Council are as follows:

The allocation of an additional 35 homes as detailed in SCLP12.63 of the Suffolk Coastal District Local Plan First Draft will significantly impact the character of the small village of Tuddenham St Martin in a negative way. The village presently has approximately 170 homes and is categorised as a 'Small village' in the Settlement Hierarchy of the Draft Local Plan document. The village has a large Conservation Area and the additional housing allocation is out of proportion with the existing housing provision.

The allocation of the 35 additional homes, on 1.54ha of land, and described in the Area Specific Strategy 12.472 as 'dwellings at a relatively high density for a village location' contradicts SCLP5.2 (Housing Development in Small Villages) of the Draft document which states that:

'Residential development will be permitted within the defined Settlement Boundaries where it is:

- a) A small group of dwellings of a scale appropriate to the size, location and character of the village; or
- b) Infill development (in accordance with Policy SCLP5.7).'

It is disappointing that the District Council have ignored views put forward from Tuddenham St Martin villagers when allocating this housing provision. These comments have been highlighted by Parish Council representatives at briefing sessions with the District Council and are available on the Final Report of Tuddenham St Martin Village Review of 5<sup>th</sup> April 2016. This report is on the Parish Council website, and residents attending the Village Review session were generally in favour of modest development but in keeping with the village size.

**For further details please see Appendix 1 on page 3 of this reply** (which is page 10 of the Village Review and relates to Housing and development). The complete Village Review document may be viewed on the Local Services/Information page on the Parish Council website.

The District Council have stated that 'The responses received from the Issues and Options consultation have informed this First Draft Plan.' Yet comments from Tuddenham St Martin Parish Council have been ignored. There were fewer homes allocated in the Issues and Options consultation than in the most recently produced First Draft Local Plan and the Parish Council comments to the Issues and Options consultation were that 'There is however a query as to the number of proposed indicative number of homes specified as it appears high and in contrast with important points considered necessary for future developments by the Parish Council, and as raised in the meeting with the District Council on 20<sup>th</sup> September 2017. There are already parking problems and substandard access issues in the village from the latest developments in the village such as no turning circle in The Paddocks.'

The Parish Council held a public information session for residents of Tuddenham St Martin on 21<sup>st</sup> August 2018 regarding the Suffolk Coastal First Draft Local Plan. Villagers attending were invited to put forward their views and these included major concern as to the location of the allocated land, the high number of homes allocated (which seemed disproportionate with the number of homes currently in the village) and associated highway impact.

Additional concern was raised that such a high number of homes would exacerbate the problem already being experienced in the village of children often failing to gain access to the catchment high school due to the village being on the outskirts of the catchment area.

The limited bus service already results in a reliance on car journeys and older villagers being more inclined to move from the village to locations with better local service infrastructure.

None of these issues seemed to be addressed in the First Draft Local Plan.

There was a consensus of opinion from villagers present at the meeting that the proposed number of dwellings on the site was excessive and would alter the character of the village, and that additional or alternative sites which had access to the main road and for a smaller number of dwellings would be looked upon more favourably.

Please see Appendix 2 on pages 4-8 of this reply for a full copy of the report of the meeting.

The Parish Council considers that allocated housing in the village would be looked upon more favourably if the Suffolk Coastal Local Plan First Draft had used at the least similar criteria, although it is still considered too high a number of additional homes, as that used for SCLP12.40: Land at The Street and Mill Lane, Brandeston.

Please see Appendix 3 on pages 9 & 10 of this reply for details of the Area Specific Strategies for Land at The Street and Mill Lane, Brandeston.

As a comparison both villages are classified 'Small Village' in the Settlement Hierarchy of the Draft Local Plan document and both have Conservation Areas.

Brandeston scores 15 in the Settlement Hierarchy Evidence Base document,

Tuddenham St Martin scores a lower 11 in the Settlement Hierarchy Evidence Base document.

For Brandeston 30 dwellings of 'high quality and to be appropriate within the context of Brandeston Conservation Area to the South' are allocated on 2.06ha of land.

For Tuddenham St Martin 35 dwellings 'a relatively high density for a village location' are allocated on 1.54ha of land.

Additionally the Area Specific Strategy for Brandeston states that 'In order to respond to the character of the area the site is considered to be suitable for development at a relatively low density, and it is considered that there is potential to accommodate bungalows within the site'.

No such consideration has been made for the Tuddenham St Martin allocation.

A similar number of homes border the site allocated for Tuddenham St Martin as in Brandeston, although it needs to be pointed out that the site in Tuddenham St Martin already lacks adequate highway infrastructure, but there is no mention that the allocation for Tuddenham St Martin should be appropriate within the context of the Tuddenham Conservation Area or the low number of homes on the adjoining site.

Kind regards, Mrs C Frost (Tuddenham St Martin Parish Clerk).

(Email address supplied with original document, and contact available via Parish Council website)

Comment	People who agreed	Votes
<b>Housing &amp; development</b>		
We are a village and should not be absorbed into Ipswich by development	3	10
Because of its proximity to Ipswich Tuddenham is under threat from plans to develop housing estates on the northern edge of the town. To retain the unique character of the village and of the Fynn Valley it is vital to limit development. There may be very limited scope for some infill within the village. A small number of houses for elderly residents to downsize would be helpful. There is a risk of the village becoming a dormitory/village for the retired! It needs people of all ages to increase its vitality.		
No properties for Council tenants to downsize to in the village		
Only infill housing or small scale needed		
Housing development should be in keeping with village size		
Mix of houses/homes needed, too many large dwellings		4
Housing – no large scale development. Not towards Ipswich		
What about Northern Fringe, won't this flood area with 20k properties?		
Housing: <ul style="list-style-type: none"> <li>Develop brownfield sites within Ipswich before expanding into greenfield sites</li> <li>Consulting rural groups before further urban sprawl happens</li> <li>Stop further building in greenfield areas south of Tuddenham</li> <li>Develop brownfield sites in Ipswich</li> </ul>		3
Housing: <ul style="list-style-type: none"> <li>Encourage development of right sort of housing – no more exec homes</li> <li>Not towards Ipswich</li> <li>Extra public parking areas on any future developments</li> </ul>		
Only sustainable development with associated services – provided by CIL or S106 Or apply Grampian conditions		1
Any new housing would be unsustainable and lack of infrastructure would make this unviable		1
Roads not sufficient to support large development	2	
Affordable housing for local people; thought that was what last development was (?) but price not affordable. Moved out of village with young family – moved back when they grew up		1
Infilling – fine – building in large gardens, but not to expand beyond the village envelope		3
Any new housing must have adequate parking....if not cars will be parked anywhere		
Most people have large gardens		
Keep fields around village but allow some development		
Character of village is down to size and community spirit	1	
If Tuddenham grew it would spoil character		1



Appendix 2 (copy of report following First Draft Local Plan public information session held 21<sup>st</sup> August 2018).

Report of the special information meeting on the Suffolk Coastal First Draft Local Plan, including 1.54ha of land off Keightley Way Tuddenham allocated by the District Council for development of approximately 35 dwellings.

Prior to the meeting the following papers were handed out to members of the public present:

- A copy of the presentation to be given by Mrs Ellinor
- A copy of the pages 323 and 324 of the Local Plan First Draft document (specific to the land off Keightley Way)
- A copy of the District Council information page on how to get involved with the consultation (including timeline, locations where to find out more information and how to submit comments).

The meeting was held on 21<sup>st</sup> August 2018 and commenced at 7.35pm at the village hall.

Present: Mr W Pipe, Mr H Brightwell, Mr D Lugo, Mr Hodge, Mrs J Ellinor & Mrs C Frost (Clerk). 30 to 40 members of public present.

- 1. Chairman's Welcome and Apologies.** Mr Pipe welcomed everyone present to the meeting. Apologies were received from Mr Beckett, Ms Procter and Mr Whiting (District Councillor).
- 2. To receive declarations of interest.** Mr Pipe declared an interest in the sole item to be discussed so handed over the remainder of the meeting to Mr Brightwell.
- 3. Presentation from the Parish Council following attendance at a briefing session with the District Council on the First Draft Local Plan.**

Mr Brightwell explained that the First Draft Local Plan consultation would be used to set the strategy for the District and village. This meeting was to provide information received following 3 Parish Councillors having attended the briefing session held 14<sup>th</sup> August 2018 by the District Council on the First Draft Local Plan. It was also to obtain views on the consultation from residents.

Mrs Ellinor would give the presentation on behalf of the Parish Council.

Mrs Ellinor gave the presentation, a copy of which follows this report, and gave an overview of the briefing session attended by Mr Brightwell, Mrs Ellinor and Ms Procter. Mrs Ellinor reported that the land in question in Tuddenham was at allocation only at this stage, and not yet at the planning stage. Mrs Ellinor then read to the public an email received from the owner of the land as follows:

The land was submitted following call for sites from Suffolk Coastal District Council. There is currently no proposal submitted for this site, and the figure of 35 houses allocated by Suffolk Coastal is presumably a calculation based on their perception of an appropriate density on the area involved. Whilst we will be considering the options for the land, we welcome input from the community as we seek to take this project forward.

- 4. Public Forum.** Mr Brightwell then invited members of the public to put forward their views.

The major concern, which was reiterated in various ways, related to inadequate highway provision, although other concerns were also raised. The views put forward included:

This allocation would result in more than 200 movements of traffic on Keightley Way and Westerfield Lane when built (both roads already difficult to manoeuvre at times). This was not a practical solution to the need to build new homes. There would also be negative highway implications from building traffic during site development. It was acknowledged the government needed new housing provision but alternative sites to this one should be sought. An example was given of the plot of land located by the old police house on the main road entering the village from Ipswich, especially in view of it having better access to the main highway. Any development on this plot of land, which for instance also backed on to the village hall boundary, could also be used as an opportunity to include the provision of a new village hall for the community, with a reduced number of homes in the region

of 10 dwellings, which would be more in keeping with the village character. It was reported by a member of public that sites for allocation could be nominated to the District Council by a third party, not just by the landowner and it was the intention of a resident to nominate an alternative site to the one already allocated. Concern was raised that any eventual development on the land at Keightley Way would result in expensive 4 and 5 bedroom homes, built closely together in order to make the site viable for developers. Concern was raised that the land allocated at Keightley Way would only be serviced by a single track road which was not gritted by the Highways Dept. in winter, making it completely inadequate. Did the housing provision need to come from Tuddenham? Concern was additionally raised that the existing highway infrastructure would not be able to cope with the direct and indirect traffic associated with the Keightley Way allocation. The figure of 35 dwellings was disproportionate with the number of homes currently in the village and the character of the village would change as a result. Concern was raised that the decision had already been made by the District Council for the allocated dwellings at Keightley Way. Such a high number of additional homes would exacerbate the problem already being experienced in the village of children often failing to gain access to the catchment high school, due to the village being on the outskirts of the catchment area. The limited bus service (none provided of an evening or on Sunday) already meant older villagers were more inclined to move away from the village, as it was felt necessary to have the use of a car. There did not seem to be any evidence of an improved bus service, or other infrastructure improvements in the Draft Local Plan. There was a consensus of opinion from those present that the proposed number of dwellings on the site was excessive and would alter the character of the village, and that additional or alternative sites which had access to the main road and for a smaller number of dwellings would be looked upon more favourably. Mr Brightwell and Mrs Ellinor reiterated the need for residents to submit their comments on this consultation to the District Council and that the deadline for comments was 14<sup>th</sup> September 2018. The meeting closed at 9pm.

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A copy of the presentation follows

**Suffolk Coastal Local Plan – First draft consultation.  
20<sup>th</sup> July to 14<sup>th</sup> September 2018.**

**Timeline**

July 2013 - SCDC Local Plan

April 2016 – Tuddenham Village Review

June 2017- SCDC Parish Councillors Workshop

Sept 2017 – Call for land

July 2018 – Draft Suffolk Coastal Revised Local Plan published

Sept 2018 – End of consultation

Jan 2019 – Revised Local Plan to be adopted

## 2013 Local Plan

The Settlement Hierarchy for development included 6 categories:

1. Major Centres
2. Towns
3. Key Service Centre
4. Local Service Centres
5. Other villages
6. Countryside

Tuddenham was classified Other Village – no additional houses.

## Village Review - Housing

Generally residents were in favour of some development provided it:

1. Included required mix of housing – no more large Exec. Houses
2. Provided ample parking – for residents & visitors
3. Was limited to a modest number of additional homes – roads cannot cope with additional large number of houses

## SCDC Workshop for Parish Councillors

- Most Councillors from Other Villages felt restrictions were too fierce
- Communities need to be dynamic not stagnant
- Homes needed to meet local needs – diverse housing mix
- Preferably including green space
- Minimum 2 parking spaces per property

## Call for Sites

Two sites put forward by landowners :

1. Land off Keightley Way
2. Land adjacent to Hilltop, Westerfield Lane

SCDC did not decline either site but they chose Keightley Way as the preferred development site.

## Revised Local Plan

Major change is the reduction of categories in the Settlement Hierarchy from 6 to 5. These are now:

1. Major Centres
2. Market Towns
3. Large Villages
4. Small Villages
5. Countryside

Tuddenham is now classified as Small Village

## Small Village Development

Housing development will be permitted within the Settlement boundary where it is:

a) A small group of dwellings of a scale appropriate to the site location and character of the village

or

b) Infill development (in accordance with SCLP5,7)

Note: Housing mix in any new development should be in line with SCLP 5-8

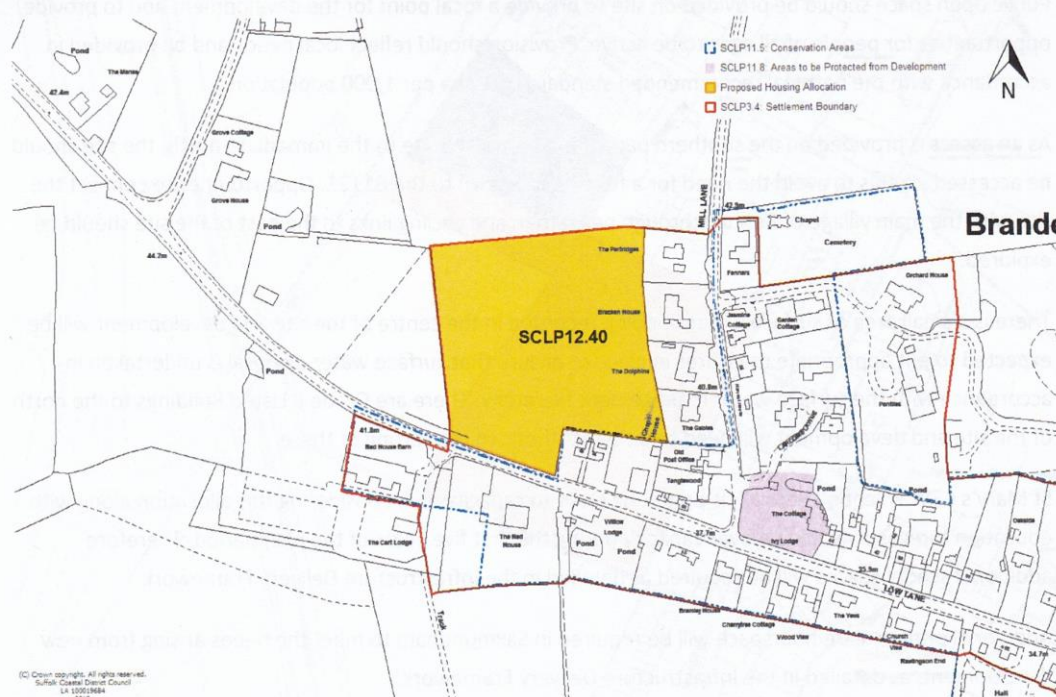
## Neighbouring Small Villages

To put this proposal into perspective compared with overall development in SCDC district and , more relevantly with neighbouring villages please see the following :

<b>Location</b>	<b>2016</b>	<b>Increase.</b>	<b>%</b>
SCDC	61,157.	12,195.	19.94
Tuddenham	176	37.	17.6
Westerfield	191	91.	47.6
Witnesham	340.	75.	22.0



## Land at The Street and Mill Lane, Brandeston



- 12.299 Brandeston (2011 pop.296) is identified as a Small Village in the settlement hierarchy, reflecting the services it has which include a shop and a village hall.
- 12.300 The location of the site follows the village form by extending to the existing edge of the settlement to the north and west. The area immediately surrounding the site is characterised by detached houses on generous plots, and the southern edge of the site borders Brandeston Conservation Area. In order to respond to the character of the area the site is considered to be suitable for development at a relatively low density, and it is considered that there is potential to accommodate bungalows within the site.
- 12.301 The site is currently relatively open to views from the west and north and therefore careful consideration will need to be given to boundary landscaping. The site is located on the edge of the settlement and in this regard has potential to operate as a gateway development. Public open space provision should contribute to this gateway. Provision of open space should reflect local needs and be provided in accordance with the national recommended standard of 2.4ha per 1,000 population.
- 12.302 Access to the site would be via The Street and sufficient visibility splays will need to be accommodated. Development should protect the fine grained enclosure patterns and drainage ditch networks and provide sympathetic management for ecological benefits.

The site is within the catchment of Easton Primary School which is operating close to capacity and, considering this allocation along with education forecasts, would be over capacity during the first five years of the plan period. Therefore additional school spaces will be required as detailed in the Infrastructure Delivery Framework.

Additional primary care floorspace will be required in Framlingham to meet the needs arising from new development, as detailed in the Infrastructure Delivery Framework.

### **Policy SCLP12.40: Land at The Street and Mill Lane, Brandeston**

2.06ha of land at The Street and Mill Lane, Brandeston, as shown on the Policies Map, is allocated for the development of approximately 30 dwellings.

Development will be expected to accord with the following criteria:

- a) Design and layout to be of a high quality and to be appropriate within the context of Brandeston Conservation Area to the south;
- b) Provision of a mix of housing to include smaller, terraced housing set back from the main road and bungalows;
- c) Affordable housing to be provided on-site;
- d) Provision of public open space to be designed to reflect the site's position as a gateway to the village;
- e) Provision of appropriate landscaping to the west and northern boundaries of the site;
- f) Retention of mature trees and hedgerow along the southern border; and
- g) A flood risk assessment will be required, and any necessary mitigation provided.