

## **Westerfield Parish Council consideration of Planning application DC/17/5215/OUT St Mary's Way Westerfield**

The Parish Council met to discuss this application on Tuesday, January 16th 2018. The meeting considered the effect of this application on the character and community of Westerfield. The meeting was attended by members of the public and the council agreed the following comments in relation to this planning application.

### **Housing approval history**

Residents expressed concerns over the obtrusive nature the development would have on adjacent dwellings, exacerbated by the site gradient.

We understand that a planning application in 1981 was rejected on appeal on the grounds that: *it would be obtrusive and would affect the privacy of existing dwellings. It would extend the physical boundary of the village and, as an extension to the existing St Mary's Way development, would still be at odds with Westerfield's character.*

We believe that this judgement should be taken into account when considering this application.

### **Detailed comments on points made in planning application**

This application is non compliant with key policies in the current active Local Plan and a significant part of the application makes reference to the National Planning Policy Framework (NPPF) and argues that the current Local Planning Polices are out-of-date because a certain aspect of the Local Plan is non compliant with the NPPF. It claims that Suffolk Coastal does not have a 5 year land supply.

The application mentions a number of statements from the NPPF and uses them in isolation to justify this development. This is a misinterpretation of the role of the NPPF. The main purpose of the NPPF is to provide a framework for producing Local Plans. It covers situations where no Local Plans exist and makes a statement on the consequences of not having a 5 year land supply.

Suffolk Coastal has an adopted Local Plan, approved by central government, covering the period 2010 to 2027 which had to be compliant with the NPPF. According to the NPPF, Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development. Local Plan policy SP1A complies with this by stating 'Planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise. The Local Plan has identified sites in Westerfield to satisfy housing needs, detailed in the Site Allocations document. This site is not included.'

If the Local Authority cannot demonstrate a 5 year land supply, then Paragraph 49 of the NPPF states '*Relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.*'

There are lots of claims and counter claims in the application regarding housing numbers and available land supply. These are dynamic entities and the Local Authority is expected to review the supply on an ongoing basis to maintain compliancy with the NPPF. This is a matter for SCDC and we expect them to robustly defend the compliancy of the Local Plan with respect to this application. The consequences of not having a 5 year supply are serious and can lead to unneeded development in

the wrong location, as demonstrated by the Fieldfare Way development off Church Lane, Westerfield.

The application makes reference to the recent application at the Mount. This council strongly disagrees with the decision to grant approval for this site following an appeal. It undermines the integrity of the Local Plan, produced at great cost to tax and rate payers. Local residents objected, the Parish Council objected and the Local Authority rejected it. So much for ‘Localism’! The main reason given by the government inspector was that the scale of development was considered to be appropriate. This is clearly wrong, as we will justify later in this document. Also this judgement should not automatically apply to subsequent developments. Each application has to be considered on its own merits following due process, and if unsuccessful, the applicant has the right to appeal at the end of the process, if they so wish.

The sustainability assessment is unconvincing, with 5 dwellings hardly enhancing local services within the surrounding area. The economic argument fails to justify that the development is actually needed. Westerfield already has planning approval for developments covering the period 2010 to 2017 far in excess of targets given in the Local Plan.

The development is not near any retail services and one of the key issues in the village according to residents is the danger of walking on roads, with no pavements, which are subject to heavy traffic. Pedestrian access to the centre of the village such as the Church, Village Hall and local bus stop and train station is via Church Lane, a narrow lane which has no pavements and has over 4,500 vehicles travelling on it every day. St Marys Way is also regularly used as an overflow car park for events in the village making it difficult for residents to access their properties. The Village Hall car park only caters for 19 vehicles.

The bus and train services only run about every hour. There is no bus service in the evenings or Sundays and there are effectively no direct trains for journeys to and from Woodbridge and Lowestoft.

There is no flooding and drainage assessment in the application.

There is no assessment on the impact to wildlife. There is a variety of wildlife that uses this site.

#### **Analysis of housing requirement in Local Plan**

Strategic Policy SP19 in the Local Plan determines the scale of development for Local and Key Service Centres to be 17% of the total housing proposed for Suffolk Coastal during the plan period. Westerfield is classed as a Local Service Centre in the settlement hierarchy and the Core Strategy calls the growth for such settlements of between 10 and 12 units on average. The Site Allocations document actually *allocated 61 units* for Westerfield in the plan period 2010 to 2027 which is far in excess of what would be reasonably expected. The document recognised this.

Since the Local Plan was issued a number of *additional* developments have been approved for Westerfield.

Since 2012 the total number of new dwellings in Westerfield that have already been built, are under construction, have recent valid planning approvals, or is a preferred site (land south of Lower Road) in the current Local Plan, covering the period 2010 to 2027 is 91; increasing the total from 193 in 2010 to a potential 284. This is significantly more than allocated in the Site Allocations Document, which is significantly more than what would be expected in the Core Strategy requirement. This

represents an increase of 47% without any improvement or increase to services in the village. Details can be provided if requested.

The Parish Council believes that Westerfield is already taking more than its fair share of new housing and there is no requirement for any additional housing in the current plan period.

### **Meeting requirements of Local Plan**

Strategic policy SP1A in the Local Plan states that *planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise.* This application does not accord with policies in the Local Plan relevant to Local Service Centres (ie Westerfield).

Strategic Policy SP27 for Local Service Centres – only permit housing development within defined physical limits of a scale appropriate to the size of a particular community. The boundary is clearly defined in the Site Allocations Document. It shows that the location of this proposed development is outside the boundary.

Local Service Centre Policy SP27 recognises there is an acute shortage of affordable homes and states that one in three homes in all developments will be affordable homes and applies to all developments identified in the Local Plan for Westerfield. This development does not have any affordable homes. It does suggest that one may be provided subject to a financial assessment. This is at odds with the NPPF which considers affordable housing as an integral part, not just as an afterthought.

If Suffolk Coastal fails to show a 5 year land supply and the core strategy policies given little weight, then the NPPF says that there must be a presumption in favour of any development *provided the benefits outweigh negative impacts.* This additional new development is neither wanted or needed, has significant negative impacts and provides no benefit, as all the housing needs stated in the application can be achieved with the current planned developments if required. It therefore fails to meet the NPPF requirement and still should be rejected. No more development is needed over the current plan period

### **Summary**

Westerfield Parish Council considers that this application should be **rejected** for the following reasons:-

1. The application fails to justify the development is needed. Appraisal of their sustainability assessment shows no benefit and some adverse impacts.
2. The application is non compliant with key policies in the Local Plan associated with Local Service Centres.
3. Westerfield has already been allocated a significant number of additional dwellings without any improvement to services during the current plan period. This development is not needed as anything this development provides can be achieved through the current planned development.

Rod Caird, Clerk, Westerfield Parish Council