



Clerk to the Council  
Street Farm, Westhorpe  
Tel: 07926 223042

MSDC Planning Area Team Yellow  
Endeavour House  
8 Russell Road  
Ipswich

14 December 2019

Dear Sirs

**Planning Application DC/19/05318 – land to the south side of The Street, Westhorpe**

Westhorpe Parish Council wishes to strongly object to this application the following grounds.

In summary, the application is deficient and the planning statement inaccurate.

**Objection Point 1: new access**

There is a distinct lack of information regarding the new access in the application. SCC Highways have not been consulted, and no traffic impact assessment has been undertaken. Given that the subject of the application is new access for the site, we consider that a traffic impact assessment should have been essential to the application, and further consider it vital that one be conducted before anything other than a rejection of the application is considered.

Parking for vehicles in the dwellings opposite the site is "on road", as such this narrows the road considerably, and larger vehicles cannot pass. The addition of access at this point would create hazards and reduction in road safety, as well as depriving the residents opposite of parking.

Paragraph 4 of the planning statement maintains that a development of this scale would not generate significant levels of traffic, and that that traffic could easily be absorbed in the road network. The proposed access to the site is on an unclassified, poorly maintained road, with no safe footpath, no street lighting, and we assert that 18 extra vehicles in a village the size of Westhorpe would mean a significant rise in the levels of traffic.

## Objection Point 2: drainage

The presence of 6 houses, 6 roofs, 6 driveways, 6 paths will have a huge impact on the amount of water coming off the site. The applicant's planning statement suggests soakaways, but Westhorpe is on the Lowestoft formation, which is glacial diamicton. This being predominately clay, soakaway drainage is very unlikely to work, given clay is not permeable.

At paragraph 8 of the planning statement, the applicant dismisses the need for precise details of surface drainage at this stage. We would counter that it is absolutely critical that the applicant has a solution to this, sustainable drainage is fundamental to any application to be considered.

The pond at Street Farm, where this excess water would flow under the proposed application, only has a limited capacity. It also has an outgoing pipe that is only adequate for present use. In the past there have been instances of flooding further down The Street.

Properties on the eastern end of The Street presently suffer when there is lots of surface water, as the sewer can back up and the additional sewage and water from the proposed 6 dwellings would exponentially exacerbate this.

## Objection Point 3: Sustainability

### Environmental sustainability

In paragraph 34 of the planning statement, it is suggested that the site is a very short distance from the services in Bacton (schools, shop, pub, doctors). We suggest that the use of "very short distance" is purposefully misleading. It is approximately 3.52 kilometres from any of those services.

The footpath network to Bacton, aside from being long, is boggy and virtually impassable in all but the summer months. This means increased vehicular use as there is no adequate bus service to allow access to those facilities.

At paragraph 35, the planning statement declares that the development will be reliant "to some extent" on increased use of the private motor car. It will not be "to some extent", but to an overriding extent. This is counter to the Council's statement of trying to promote cycling, walking and the use of public transport.

### Economic sustainability

Paragraph 32 of the planning statement suggests that 6 new dwellings in Westhorpe would "sustain an improved vitality and viability of local services in Bacton". This is a very spurious reference to how development in one area is meant to benefit development in another area, and the argument appears to be that the benefit doesn't have to be a benefit for Westhorpe.

We believe this is all the more spurious given that Bacton is about to have 400 new homes, the addition of which will have a far greater impact on the viability and vitality of Bacton than 6 family homes in Westhorpe.

#### Objection Point 4: No demonstration of social, environmental or economic benefit to Westhorpe

The planning statement, while referring to the social, environmental and economic benefits of the proposed development (paragraphs 32 and 34), does not give details of these purported benefits to the community of Westhorpe.

We also question the impact 6 family homes would have on the undersupply for the 5 year housing plan (paragraph 33 of the planning statement). Given the extensive development that is going on in the surrounding areas, the impact of 6 additional house on the undersupply is minimal and doesn't outweigh the obvious social, economic and environmental detriments.

#### Objection Point 5: Light pollution

We believe the application fails the light pollution guidelines set out by MSDC.

*"Para 125 of the NPPF says Dwelling/s should not cause light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The proposed development by reason of its design, scale and layout would likely result in significant light pollution within an area of no other source of artificial light resulting in detriment and harm."*

The addition of 18 vehicles using one point of access directly opposite Nos. 5 - 12 Church Road would cause light pollution on such a scale as to be highly detrimental to those living opposition and other local residents.

#### Objection Point 6: Heritage

Westhorpe is an eclectic mix of housing that has developed over hundreds of years and though there is evidence of groups of similarly designed properties, the abrupt arrival of 6 new homes, representing around a 9% increase in our housing stock, will have an enormous impact on the character of the village.

The planning statements purports at paragraphs 15 and 17 that the erection of the proposed dwellings would not lead to substantial harm or loss of significance of any of the nearby listed buildings. Given the nature and design of the dwellings are not detailed in the application, any level of harm to heritage assets is incalculable.

#### Objection Point 7: Disregard for the Draft Joint Local Plan

We feel strongly that the application undermines the recent consultation on the Joint Local Plan, and we are disappointed that it is suggested that Planning Officer Jamie Edwards has advised that the principal of development on this site would be supported. We believe the applicant has been selective in what has been conveyed by the Planning Officer.

Given that the Joint Local Plan is still being consulted upon, and the present local plan for Westhorpe is judged outdated by central government, we consider that the applicant is exploiting this

opportunity. The proposed site is outside the present settlement boundary, and under present rules not appropriate for development.

#### Objection Point 8: Archaeology

Although the planning statement states that the site is not of archaeological significance (paragraph 5), the SCC Archaeology Officer has highlighted that there have been finds of Roman remains approximately 20m from the site. It must also be noted that the site was the site of a battle in Cromwell's era, and musket balls have been found by metal detectors in the past.

#### Objection Point 9: Ecology

We believe the application fails the ecological impact guidelines set out by MSDC.

There is no mention of protected species at all in the application. In fact, Natural England specifically excluded protected species from their comments, which we consider to be flawed. There are great crested newts found in a number of sites in Westhorpe, and it is possible there may be newts in the pond and over the proposed development area.

Natural England had previously commended this area as an area of outstanding natural night light, as there is little or no light pollution in Westhorpe. The additional of 6 dwellings would have an injurious impact upon this.

#### Conclusion

On the basis of: lack of details and supporting assessments in the application; inaccuracies in the planning statement; inadequate drainage provision; detrimental impact upon road safety; the absence of evidence of sustainability or social, economic and environmental benefits to the community of Westhorpe, we respectfully request that this application is rejected.

Paragraph 2 of the planning statement states that "the application has been subject to positive pre-application discussions with [the] Planning Officer ... [and he] advised that the principle of development on the site would be supported". On the basis of the above points, we find it difficult to understand the supported principle of MSDC Planning Officer, and accordingly have lodged a request under the Freedom of Information Act to obtain details of this support.

We have also requested that our District Councillor, Andy Mellen, table this application for decision by the Planning Committee, rather than a the delegated powers afforded the Planning Officer.

Yours faithfully

Westhorpe Parish Council