

Westhorpe Parish Council unanimously and **strongly objects** to the principle of any residential development on the land Nominated as 'Land to the South of Church Road, Westhorpe, IP14 4SU' and to Application for Outline Planning Permission – DC/22/00594 –Town and Country Planning Act 1990 – Erection of 7 dwellings (including 2 affordable homes) and new vehicular access at that location. This application differs very little from the previous 2019 application DC/19/05318, refused by MSDC and fails to address the main issues raised in refusing that application.

We feel that any approval would prejudice the new Joint Local Plan process which has not been completed.

Westhorpe Parish Council objects on the following basis.

It conflicts with the existing District Plan and the Proposed Joint Local Plan: We note that the JLP submitted in March 2021 was not accepted at Examination and that the inspectors suggested that it be resubmitted with the settlement boundaries as per the 1998 plan. Notwithstanding this, a consultation has been underway since 2017 in which local communities identified sites where they were prepared to support, or at least accept development in their area. The subject site of this proposal was widely opposed by the people of Westhorpe. It was removed from the most recent allocation map prior to the March 2021 JLP submission because of this opposition and following the rejection of the 2019 planning application.

This application suffers from conflicts with the same Local Planning policies and Mid Suffolk Local Development Framework Core Strategy Focused Review policies as the previous application. These policies seek to control development in the countryside and direct development to higher order settlements with a greater range of services and facilities. We note that if the 1998 Mid Suffolk Local Plan Proposals Maps are reverted to rather than adoption of the March 2021 JLP allocation maps, the subject site remains outside of the settlement boundary of the village and designated as countryside. The proposed development of this site would therefore appear to be at odds with at least Policy CS2 of the 2008 Mid Suffolk Core Strategy. It is also outside the proposed JLP allocation map boundary, should this be adopted.

It fails to meet the three key elements of a Sustainable Development, i.e. Economic, Social and Environmental, fundamental to complying with NPPF: The refused planning application of 2019 was for 6 dwellings on the same site. The MSDC refusal notice of the 2019 application stated the *“the proposal is not considered to constitute a sustainable development when assessed against the three tests of sustainability within the NPPF”*. We question that this application could be considered as any different and note the following in the context of the specific issues raised by the Planning Officer on the 2019 refusal:

The suggested economic benefit is overstated and comes at a significant environmental cost: An economic benefit to Bacton is cited in the application Planning Statement. Bacton is located 2.2 miles away and the only practical means of reaching it, or any other village/town, from Westhorpe on a regular basis, is by car which inherently fails to promote walking, cycling and public transport use, conflicting with paragraph 104 of the NPPF.

Bacton currently has planning approval for 405 new homes, many of which are already under construction. The economic benefit to Bacton of seven new homes in Westhorpe would be negligible and there would be no discernible economic benefit to Westhorpe.

It is damaging to the heritage of the local properties and the village as a whole: The (DC/19/05318) refusal made extensive reference to the harm to and loss of the significance of a designated heritage asset from development within its setting, specifically with reference to Street Farm and the undue erosion of a part of the agricultural setting of the property.

The NPPF specifically refers to the importance of heritage assets when assessing sustainable development in its key Paragraph 11.d.i footnote 7. The Mid Suffolk Core Strategy Objective SO 4 specifically relates to protection, management and enhancement of historic heritage. The rejection of the 2019 application noted that there was an absence of meaningful public benefits to offset the identified harm (ref Para 134 of the NPPF) and therefore was not acceptable. The current application appears to suggest that the provision of two affordable houses on the outline planning application offsets this concern. This would seem to be incorrect for at least two reasons: Firstly, that the suggested affordable housing in this application increases the total number of dwellings from the previously rejected six, to seven dwellings. It is impossible to see how even greater development of the site goes any way towards offsetting the harm to the heritage asset. We note that the response to the consultation of the MSDC Heritage Team for this application appears to support this. Secondly, as an outline planning application the layout and type of housing is indicative and as such there will be no requirement for affordable housing as the site falls below the thresholds of number and area that would require such provision. Consequently, while it may be offered at outline planning stage, it cannot be material in consideration of the offset to the harm caused to the designated heritage asset.

Access: The Suffolk County Council Highways Department's response to the consultation on the previous application stated that any proposal to provide access to the site would be required to widen the road adjacent to the frontage of the site from the existing 4.0m to 4.8m. The visibility splays drawing provided with the current application (1202-03) does not appear to show this. We believe the proposed access is dangerous. Visibility from either direction either accessing or exiting will be perilous. The traffic using the access would cause significant light pollution to properties opposite.

Drainage: The current application again refers to the use of soakaway drainage. The site is situated on the Lowestoft Formation which is of variable composition, but in the Westhorpe area is typically a clay of low permeability in which soakaway drainage is very unlikely to be effective. The additional surface water created by roofs, pathways and driveways will overwhelm any proposed drainage scheme and result in flooding to the east of the village.

Ecology: Despite the submission of an ecological report the same reason for refusal in item 3 of the Notice of Refusal of previous application DC/19/05318 remains as follows: There is a lack of sufficient detail with regards to ecological information especially Great Crested Newts, to enable the Local Planning Authority to carry out a proper assessment with certainty of impacts on legally protected and Priority species. Given the surrounding habitat potential it is considered there is significant risk of harm from the development in this regard. As a result, the proposal has failed to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006. The proposal is contrary to the Local Planning Policies, the Core Strategy and the guidance contained within the NPPF.

Light Pollution: The Parish Council believes this application fails the light pollution guidelines set out by BMSDC:- *"Para 125 of the NPPF says dwellings 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 Parish Council believes that the addition of an estimated 18 to 20 additional 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 not just opposite the site, but also to other local residents in close proximity to it.

Westhorpe is not expansive. There are no demonstratable, economic, social or environmental advantages to Westhorpe. The Parish Council would reiterate its unanimous strong objection to this outline application (as illustrated above) on the grounds of it being grossly unsustainable, its adverse effect on the heritage of Westhorpe and the distance to any services. The application fails to meet or apply to Mid Suffolk's planning policy. It is clear that MSDC now have an almost ten years land supply and further demonstrates that there is no need to be developing land outside the existing or proposed development boundaries.