**BMSDC JLP Consultation Advice Q 29- Q62 Gypsy - Design**

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**Q) Accommodation Needs of Gypsies and Travellers**

* Minimal impact on BDC
* Protection under planning of traveller sites should be dependent on respectful use and respect for neighbouring communities.
* Although policy relates to both BDC and Mid Suffolk the report suggests that need is mainly in M.S.
* The Cromer incident occurred when travellers gathered in large numbers therefore, limiting sites to short stay and small number of vehicles (say 3 days/3 plots) with sites well spread apart (say 20 miles) is safer for communities.

**Permanent Gypsy and Traveller Sites**

**Option GT1 – Allocate site(s) to meet identified requirements**

**Under option GT1 site(s) would be allocated to meet the identified need for permanent sites in Mid Suffolk.  This could include allocating extensions to existing sites where this can be accommodated; or**

* Policy relates to both BDC and Mid Suffolk but need only identified for Mid Suffolk at this point

**Option GT2 – Allocate sites for Gypsy and Travellers as part of residential allocations**

**Under option GT2 sites for Gypsies and Travellers would be identified as part of larger housing allocations in Mid Suffolk.**

* Policy relates to both BDC and Mid Suffolk but need only identified for Mid Suffolk at this point
* However this option might mean traveller sites included as part of a development application and that may be problematic
* It is probably safer to consider traveller sites in the proximity of development sites after that development has been established.

**Travelling Showpeople’s yards**

**Option TS1 – Allocate site(s) to meet identified requirements.**

* These are sites for things like travelling circus shows
* Not clear exact purpose or tenure periods being considered

**Existing authorised pitches and plots**

**Option EGT1 – Protect existing authorised pitches and plots**

* Council has a duty to provide facilities for travellers etc.
* However protection under planning of traveller sites should be dependent on respectful use and respect for neighbouring communities.

**Q 29.    What should the Councils’ approach to provision of negotiated stopping places be?**

* Council has a duty to provide facilities for travellers etc.
* Suggest that problems occur when travellers gather in large numbers (Cromer)
* Therefore, limit sites to short stay and small number of vehicles (say 3 days/3 plots) with sites well spread apart (say 20 miles)

**Q 30.    Please submit details of any sites, or extensions to existing sites, which you consider are suitable for allocation as Gypsy and Traveler sites or Travelling Show-people sites.**

* None come to our mind
* However proposals might best come forward from travellers who know where they need to stop

**Q 31.    Should the Joint Local Plan include a policy which identifies areas where moorings would be acceptable in principal?**

* Due to preservation of Gipping Valley / River we do not see this as an issue for Sproughton
* As a general observation the only practical areas for houseboats would be AONB (ie Orwell/Stour/Deben).
* House boats should be in keeping with surroundings and subject to planning scrutiny.
* Many houseboats are old wrecks which may still have a beauty of form that matches their maritime environment. However most houseboats then have monstrosities built on their decks that turn them into eyesores.
* Due to their considerable size and lack of mobility these wrecks lack any forward maintenance, especially under their hulls which rot and eventually fail leaving the wreck useless and abandoned. At that point a new house boat may be practical, but only if it replaces the old wreck that is removed.

**Q 32.    If so, are there any specific locations where additional moorings could be located?**

* As a general observation not applicable to Sproughton however, there might be a case for houseboats on the upper tidal stretches of the Orwell within IBC.

**Economy**

**Q) Economic Needs**

* A fundamental oversight is that the effects of Brexit has not been considered, either in trade, employment or migration calculations.
* Projections based on historic data all pre Brexit Vote which we consider will not be realised and therefore over optimistic.
* Consultation suggests projections could be even be more ambitious (If growth has been previously constrained – without any evidence of that being the case).
* Council finances dependent on growth but as above projections appear optimistic and as the finances of all councils depend on growth this is an issue that is nationally competitive.

**Option ECON1 – Allocate to identified need**

**To allocate the minimum amount of employment land to accommodate the jobs growth forecast by the East of England Forecasting Model**

* The Sugar Beet Factory alone is already supplying more land than this JLP’s projected requirement.
* Commercial sites proposed significantly more than the identified need (which we believe is inflated anyway)

**Option ECON2 - Allocate above identified need**

**To allocate more employment land than that required to meet the jobs growth forecast by the East of England Forecasting Model**

* As in ECON1 above this is already covered, and then some, by the Sugar Beet factory
* Other than new strategic sites that need to be located in a specific location for a site specific purpose.

**Q 33.    Should we continue to identify existing employment areas and protect land and premises in these areas from redevelopment / conversion to other uses unless marketing evidence demonstrates there is no demand for employment use?**

* The JLP identifies an oversupply of 187 hectares (identified need is 12.3 hectares) of available employment land.
* Some of this is likely to be brownfield land in ideal areas for housing development.
* We feel it should be used for that in preference to greenfield land proposed for housing.
* We therefore feel protection is inappropriate and that excess employment land, especially any brownfield sites, should be promoted for other uses like retail / housing if appropriate.

**Q 34.    If we continue to protect existing employment areas, which areas should be identified?**

* Only those that are strategic to anticipated commercial development over the next 20 years.
* So much is likely to change in industrial practices in the next 20 years it is quite possible that we will be looking at an entirely different commercial landscape, with entirely different needs. With so much excess sites coming forward there is little point in protecting them.

**Q 35.    Are there any existing employment areas that could be reallocated to other uses?**

* As in Q33 and Q34

**Q 36.    Should we identify areas where non-B class uses, such as car showrooms, tyre and  exhaust centres and building material stores, can be located?**

* Best located in out of town retail park areas with car parking to reduce congestion in town centres.
* These are also ideal for retail convenience, like supermarkets / DIY / Garden centres where good parking for loading heavy goods is located within a retail area.

**Q 37.    Should there be a policy that allows a wider range of uses than just B class on all employment sites or selected employment sites?**

* In our opinion, yes because the commercial market is changing constantly.
* Also as in Q36

**Q 38.    Should we allocate more than enough land to meet the forecast needs to enable more choice in the market and give flexibility to changing circumstances?**

* The JLP already is. A little spare capacity is good, a lot looks bad.
* Typically overprovision in Ipswich left us with the wine rack by the marina.
* Do we want the district covered with half-finished developments?

**Q 39.    Should we make specific employment provisions for small and medium sized enterprises? If so, how and where?**

* The council should be promoting unused commercial capacity (council register of unused commercial properties?) to be used before building more that may just going to lay idle.
* Suggest small businesses conducive to Suffolk landscape and should be encouraged.
* Small local business is very dependent on local transport infrastructure and this is big failing in Suffolk

**40.    If we expand, or allocate additional employment land where should these be?**

* Ref Q33 and Q34 we believe there is a significant oversupply other than strategically located sites.

**Q 41.    What approach should we take to supporting new business formation across the  Districts?**

Some thoughts:

* Northern Ipswich Bypass
* A1071 is main access route into Ipswich from BDC
* Some provision to link A1071 directly with A14.
* A1071 junctions at Beagle, Hadleigh and London Road
* IBC to review London Road river crossing to relieve congestion which back all the way to Copdock and A0171 from Hadleigh.
* Better Railway Service (disproportionately expensive)
* Possibility of New Railway Station South of Ipswich with decent access and parking
* This all needs investment and growth and will not happen if SCC, BWSC and IBC cannot collaborate to create a transport system to support their aspirations.
* Financial inducements for start ups and small business’s
* Council built commercial sites with subsidised rates/rents
* Council to generate local growth by building council estate properties
* Create a strong and effective business development team within BMSDC
* Incentives and council building would require a financial commitment by BMSDC but one that would create wealth and growth.

**Q) Town Centres and Retail**

* Consultation anticipates growth in BDC retail space.
* Identifies leakage of local trade to main towns Ipswich, Bury St Edmunds and Colchester and presumably the hope is that reversal of this leakage will generate the growth but that can only happen if BDC iscompetitive.
* Click and collect facilities out of town may add some retail opportunities but possibly better outside town in retail parks areas.
* Call for sites did not actually bring forward any retail (presumably town centre) sites.
* Table shows Comparison and Convenience retail. Our understanding is comparison retail is shop to shop browsing. Convenience is therefore more like supermarkets.
* Logical development is Comparison – town centres, Leisure - Leisure Parks and Convenience (Supermarkets, DIY, Garden centres, Car dealers/servicing etc.) that need nearby parking for loading etc.- Retail Parks.

**Q 42.    Do you consider that any of the sites put forward as part of the Call for Sites should be allocated for retail or commercial leisure use? Please state why.**

* You may consider comparison shopping is better grouped together to enhance the experience and quality of a town centre.
* If there is a shortage of comparison retail space available in Town centre space then Comparison retail space could be created by encouraging Convenience retail into Retail Parks close to parking, and leisure like climbing/bouldering walls, children’s play facilities / bowling / cinema’s / restaurants Swimming pools etc. into Leisure Parks in appropriate locations.
* These parks could use commercial site allocations.
* However if Town Centres are struggling as retail centres any retail / leisure in town centres should remain.
* The considerable excess of commercial sites may well also be better options for housing.

**Q 43.    Are there any other sites that should be considered for retail or commercial leisure use?**

* There is a massive oversupply of commercial sites so no need to consider anything else.
* But perhaps Brownfield should be given priority for development over Greenfield.

**Q 44.    If you consider allocations for retail development should come forward as mixed use, please provide details.**

* Call for sites didn’t bring forward retail sites.
* Comparison retail is best located in town shopping centres which is very limited so any mixed use should retain the ground floor shop frontage
* As in Q42 encouraging Convenience and Leisure into Retail / Leisure Parks might free up retail space to develop town centre shopping areas. These could be incorporated into Mixed use.

**Town centres**

* Shops thrive from being near other shops, and some leisure facilities like restaurants café’s etc. compliment the shopping experience
* Report explains how town centres can grow from a mix of Comparison, convenience and leisure.
* Retail is for some a leisure activity and developing an attractive and functional mix is the key to that.
* Suggests expansion out from ‘town centre’ to ‘edge of centre’ of retail etc. This would appear to be a suggestion that commercial or residential areas could be changed to retail or mixed use.
* If such development can be achieved in competition to the main towns, a problem then exists to provide sufficient parking especially for convenience shoppers who need to load cars. So edge of centre retail would need supporting parking.
* If there is a lack of retail sites available within town shopping centres, rather than expanding into residential areas, the convenience retail, business and leisure could be encouraged to move to more appropriate dedicated development parks out of town or edge of town so that town centres can concentrate on comparison retail.

**Out of Centre**

**Option OC1 – Restrict out of centre retail development**

**In line with the NPPF, restrict further out of centre and edge of centre retail development and seek to accommodate the out of centre capacity within the town centres; or**

* This may be too restrictive as some growth may need to be accommodated where sites become available.
* The suggestion appears to be to force all retail back into town centres, however as a rural community this is impractical unless it is supported by sufficient parking or an efficient transport network. Space needs to be allocated for parking*.*

**Option OC2 – Support out of centre retail development to meet capacity requirements**

* This should be case by case and only where need cannot be accommodated in vacant sites.
* Best restricted to Leisure parks, DIY/Horticultural retail parks using the most appropriate of the oversubscribed commercial/employment spaces that have come forward.

**Town Centres, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages**

**Option TC1 – Town Centres and Primary Shopping Areas**

* This is setting a vision for a town, defining boundaries to things like main retail/business and leisure/cultural areas to improve its function.

**For reference:**

* A1-A5 refers to shops, financial/professional services, restaurants and café’s, pubs, take-ways etc. in that order
* D1-D2 refers to Schools library’s surgeries cinemas, swimming pools gyms
* B1 refers to Offices
* However Parking provision needs to go with these services.

**Option PS1 – Primary and Secondary Shopping Frontages**

**In the Primary Shopping Frontages set the thresholds for A1 uses at a ground floor level at a minimum of 80% for Sudbury, 70% for Stowmarket and 60% for Hadleigh. For the Secondary Shopping Frontages, include a criteria based policy which supports uses A1-A5, D1 and D2.**

* This is a policy that suggests that most of ground floor frontage should be reserved for shop frontage.
* However D1-D2 might be better edge of town centre or out of town/parks etc.

**Impact assessment threshold**

**Option RIA1 – Impact assessment threshold as per NPPF. To rely on NPPF threshold of 2,500m2 gross floorspace**

* This appears to be a policy to assess what the impact might be of a large retail development on the main town centre shopping area.
* We think 2500m2 (a medium size supermarket about half the size of a football pitch) might be appropriate for a large town (eg Ipswich)

**Option RIA 2 - Impact assessment threshold**

**Set the threshold for requiring an assessment of town centre impact from edge of centre or out of centre retail proposals at 400m2 gross floorspace.**

* As above, but 400m2 is probably a better criteria for smaller market towns etc.

**Q 45.    Do you agree with the proposed Town Centre boundaries, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages? If not,  please explain why.**

* We think D1-D2 are better grouped edge of town centre or out of town.

**Q 46.    Do you agree with the approach to not define Primary Shopping Area boundaries within settlements other than the three main towns? If not, please explain why.**

* Sudbury, Hadleigh, Stowmarket are main towns.
* Defining shopping boundaries in smaller towns may restrict strategic or natural development.

**Q 47.    Do you agree with the approach to maintain and increase retail provision within the  District Centres? If not, please explain why.**

* Should be subject to local requirements.

**Q 48.    Do you agree with the proposed thresholds relating to the mix of uses within Primary Shopping Frontage? If not, please explain why.**

* We think D1-D2 activities would be better grouped ‘edge of town’ or ‘out of town’

**Q 49.    Do you agree with the proposal to require an impact assessment for all edge of centre and out of centre retail proposals that are 400sqm gross floorspace or more? If not, please explain why.**

* We think yes, however larger towns like Ipswich the NPPF threshold of 2,500m2 gross floorspace would be more appropriate.

**Q 50.    The Councils propose to protect A1-A5 uses in Core Villages and Hinterland Villages, and in local centres within towns. Do you consider this to be the correct approach?**

This would appear to be an appropriate policy

**Environment**

**Q) Biodiversity**

Some thoughts for your consideration:

* The JLP initially makes reference to those areas that are legally protected for their biodiversity. Here we see the first references to exceptions due to public interest.
* One of the problems with most wildlife legislation in relation to development is the references to ‘public advantages outweighing any adverse biodiversity impact’.
* The problem with such guidance’s are that they are subjective and the responsibility to enforce / police these regulations is devolved by Natural England down to the local planning authority. But if BMSDC stand to gain substantial financial benefit by approving the building of a thousand houses on a beautiful landscape filled with rare wildlife what pressure is there to balance a decision in favour? It is also their decision as to how closely the developer has to look for biodiversity in the first place, so if you don’t look you don’t find. They are therefore, benefactor, regulator, enforcer, judge and jury which I believe has put their officers in a difficult position of conflict ultimately governed by the financial difficulties they face due to government cut backs.
* It talks of linking biodiversity at a landscape scale which is encouraging if it means proper tree or shrub rich wildlife corridors instead of the odd narrow path.
* There is also co-operation on a strategy to protect the main wildlife sites from recreational disturbance with mitigation measures. In the case of Wolsey Grange this was just a leaflet for new occupants to tell them other places they could walk. We believe there is a need to provide other places to walk and Chantry Vale and the Gipping Valley are prime subjects for such a provision for the dense population of Ipswich.
* So SSSI and AONB have national protection policies anyway, it is primarily the local designations (like Special Landscape Areas) that need consideration to be preserved to save the best areas for our decendents.

**Option BIO 1 – Protection of designations, habitats and species**

* This is really the minimum expectation, but what actually happens relies on subjective opinions as explained above.
* This only relates to about ten species and then sometimes only to nesting periods, and often only subject to the ability to move or mitigate against a loss.

**Option BIO 2 – Protection and enhancement of designations, habitats and species**

* This appears to be an enhancement of BIO1, but the concern is that enhancements may just be options to circumvent the requirements of BIO1 to facilitate development.
* This appears to be the better choice but must be subject to the minimum standard maintained of BIO1, and preferably protection not just limited to protected species to the minimum level, but also to unusual or important habitat /species identified and to less invasive standards than minimum standards.

Note: Suffolk is served by the Suffolk Biodiversity Information Service (SBIS) that maintains all records of all biodiversity reports (wildlife / Plants / insects /aquatics etc). Developers / planning officers rely on this data to decide if there is any wildlife issues etc. But the problem is no one reports anything to the SBIS.

If every fox and mouse seen by every local resident had been reported to the SBIS the rich environment that surrounds the village would be much better protected.

**Q 51.   Do you have views on the Option BIO 1 and / or BIO 2?**

* BIO2 appears, with some reservations, to be the better option.
* The concept of linking biodiversity at a landscape level in the context section is encouraging. Too often green corridors are nothing but a narrow footpath.
* Most of Babergh is private land without public access. Biodiversity often only comes to notice once access to public or detailed surveys are undertaken. A prime example is Wolsey Grange where the Suffolk Biological Records Office had 5 recorded wildlife sightings in 20 years which is clearly farcical.
* Local area/spot designations like Special Landscape areas, view points, wildlife, flora and fauna reserves etc. have evolved from many years experience, sometimes based on fleeting observations of rare species. They preserve the best of our environment. Any policy that introduces a subjective opinion has the risk of overlooking years of experience.

**Q) Climate Change**

Context

* This initially talks of climate change, its potential impacts, that there are flood risk within the area and the many ways that planning can mitigate to reduce our impact on climate etc.

Flood Risk

* That planning should adopt strategies to mitigate. It should avoid flood areas and avoid increasing flood risk elsewhere. Take account of the impacts of climate change. It also mentions some coastal erosion at Shotley.

Renewable energy and Sustainable construction

* A description of renewable energy which I think most of us understand.
* It then explains the different standards of construction and their energy and water use efficiency there being a basic building standard and an enhanced standard that planners can require.

**Flood Risk**

**Option FR1 - Flood Risk – Leave to NPPF to provide policy framework**

* Option suggests there is a low level of flood risk in the district.
* Due to the uncertainty of changing weather patterns the threat from flooding is becoming more uncertain and SUDS (Sustainable Drainage Systems) especially close to floodable area’s is not adequate for sustained (several day) rainfall events.
* We would recommend much more robust and critical assessment of SUDS on new developments feeding into river valleys and Flood plains.
* SUDs should not reduce additional flood risk, they should eliminate any additional risk.

**Option RE1 - Renewable Energy – Leave to NPPF to provide policy**

* The advantage of that would be that the policy would change as NPPF modifies with changing circumstances

**Option RE2 - Renewable Energy policy**

**To supplement national policy under this option the Council would develop a local plan policy which will support the delivery of such technologies but will include criteria related to specific impacts including landscape.  The policy approach will need to be robust to enable assessment of effects and have scope in the future to consider emerging technologies which may be in use over the next 10 years and beyond.**

* The opportunity to do more is a good thing.
* We have a coastline that fronts the relatively shallow North Sea which is an ideal place for unobtrusive windfarms well offshore.
* Suffolk has a significant expanse of open fields that could support solar farms, and due to their low profile could do so sympathetically to the landscape
* However the balance also has to be carefully managed with Agriculture and Landscape. Food production is just as important for green management as is the green energy, protection of biodiversity and preservation of the landscape for society.

**Sustainability standards**

**Option BS1 - Building Sustainability – Include sustainability standards**

**Under this option proposals for residential use would be required to meet the optional standard for water efficiency of 110 litres/person/day and/or improved energy efficiency standards.**

**No alternative options are presented as if this option is not progressed the ‘baseline’ Building Regulations requirements would be applied.**

* If the people of Suffolk want to preserve their green environment then we have a responsibility to lead by example and do all we can.
* The higher optional standards are therefore the best option. However any developer who wanted to improve their green credentials by exceeding those standards should be supported.

**Q 52.   How should the local plan consider the impact of renewable technologies? What types of effects should be assessed within the policy criteria?**

* Visual impact is a big consideration. Wind farms can be sited offshore as we have the advantage of a shallow North Sea off our coast. Solar Farms can be sited where they have little or no visual impact on the landscape. However care should be given to the energy benefits against the loss of food production which is also a green benefit to be preserved.
* The consultation document recognises that: *local planning authorities are required to ‘... adopt proactive strategies to mitigate and adapt*
* *to climate change’*; and that *the planning system should ‘support the transition to a low carbon future in a changing climate...and encourage the use of renewable resources (for example, by the development of renewable energy)’*.
* These principles should be at the core of any policy criteria. That is to say the Policy should take a proactive approach to the development of renewable energy, not only in terms of stand-alone sites, but also to retrofitting on existing buildings and integration into new build. It is quite right that renewable energy installations need to be sensitive to the landscape and minimise visual impacts. However, such matters should not be used to override the required “proactive approach”.
* The government provides extensive guidance[[1]](#footnote-1) on how to incorporate renewable energy into local plans which states that:

*When drawing up a Local Plan local planning authorities should first consider what the local potential is for renewable and low carbon energy generation. In considering that potential, the matters local planning authorities should think about include:*

* *the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;*
* *the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;*
* *different technologies have different impacts and impacts can vary by place;*
* *the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.*
* The full “considerations” that are required as a precursor to the Policy should be incorporated into the Policy and made available for consultation.
* When considering the new build of larger groups of houses and other buildings there are many benefits from collective energy (power and heat) schemes. This can involve community heating schemes and, through small scale micro-grids, localised electricity generation, storage and distribution schemes. The technology is changing fast here, as are the cost / benefit ratios, and the Policy needs to be flexible to recognise this.

**Q 53.   Do you support the Council’s initial preference to include water efficiency measures in new build? If no, please explain why?**

Yes, especially given the fact that this area has one of the lowest rainfalls in the UK.

**Q 54.   Are there any other additional environmental standards Babergh and Mid Suffolk should be requiring? If so, please provide details and reasons why.**

* The consultation states that: *when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy*. Our understanding is that the Government’s zero carbon buildings policy no longer exists.
* However, as the consultation recognises, the March 2015 Ministerial Statement enables local planning authorities to require energy efficiency standards that exceed Building Regulations provided these do not exceed the requirements of the level 4 of the former Code for Sustainable Homes.
* It was the government’s stated intention that this approach was to be incorporated into Building Regulations but it appears this may not have been expedited. If that is indeed the case, then we strongly recommend that Babergh and Mid Suffolk incorporate this option into the Local Plan.
* Such an adoption would not only recognise the ‘proactive’ stance required of LAs, but also be in line with the policy pathways outlined in the governments Clean Growth Strategy published on 12 October 2017.
* Whilst Babergh and Mid Suffolk may not be a major flood risk area, as a result of climate change, more extreme weather conditions can be expected, and everywhere is going to be more susceptible to localised ‘flash’ flooding. This can be ameliorated through the use of sustainable urban drainage (SUD) schemes and such schemes should be incorporated in the Local Plan.

**Q) Landscape, Heritage & Design**

* General description of landscape and our area including the two AONB (areas of Outstanding National Beauty). In relation to other areas of landscape ‘Other areas of landscape which are not designated are also attractive and important and increased pressure from development has the potential to harm the quality of local landscapes. Protecting and enhancing the landscape is a key objective for the Plan’
* Relevant to Sproughton are SLA’s (Special landscape areas) which not only cover Chantry Vale but most of the area surrounding the village. Also mentioned are other local designations that relate to views, recreational and open spaces.
* It then suggests that practices have changed to look at the landscape as a whole rather than pockets of “deemed significance” which is a concern as it appears to be an excuse to ignore recognised and cherished views etc. that have been designated after many years of experience.
* Finally, the paper mentions the ‘Heritage Settlement and Landscape Sensitivity Assessment’ which is not complete but apparently will identify areas where development can enhance the landscape etc. How can we safely make comment when the main defining document has neither been described clearly or even completed?

Important Note:

* In relation to landscape character types the land from the Holliday Inn down through Chantry Vale, Sproughton and into the Gipping valley is only found in one other place in Suffolk - Dedham Vale AONB.
* Being on the edge of Ipswich it is an ideal landscape for Recreational / Nature walks etc. which would divert footfall away as required from the SSSI sites that need protection under BDC own co-operation strategy.

**Option L1 – Maintain local landscape designations**

**Under this option Special Landscape Areas, Visually Important Open Spaces and Areas of Visual and Recreational Amenity would be retained and within these areas development would be required to maintain or enhance the special landscape qualities; or**

* A very large proportion of Sproughton, not just Chantry vale, is Special Landscape area.
* What is important is ensuring that the designations are observed correctly.
* Special landscape area designation should protect the views and landscape. Views/landscape should only be accepted where permitted development is unobtrusive or enhances the landscape setting.

It is worth noting that in the case of Wolsey Grange this designation was interpreted as a need to provide green space within the development whilst allocating 3 story townhouses round the perimeter which will severely damage the visual aspect of the valley and its skyline in direct contravention of the policy.

**Option L2 – Remove local landscape designations and apply a criteria based policy**

**Under this option, all development would be expected to minimise impacts on the landscape and to enhance landscape character wherever possible, by reference to the Joint Babergh and Mid Suffolk Landscape Guidance.**

* The problem with this option is that we don’t know what it would be.
* The option is to minimising impacts wherever possible, which indicates it is proposing an acceptance that sometimes it wont be possible which is a step back from ensuring landscape is preserved or enhanced.
* There is a Heritage Settlement and Landscape Sensitivity Assessment being undertaken for the council, but we don’t know what criteria they are working to.
* The introductions to this section do not talk about preserving landscape areas but rather deciding how development should be integrated into a landscape which would indicate that the council is looking for a policy to provide them with flexibility in planning approval rather than preservation of the best landscape.

**Option HA1 – Protection of non-designated heritage assets**

**Include a policy which identifies the types of assets which would be considered as non-designated heritage assets, such as identified buildings, features, gardens, greens, commons and tyes. A policy approach consistent with the weight afforded to non-designated assets in the NPPF would be applied.**

* Who will be responsible for identifying these assets?
* Will BMSDC accept a locally produced list of non-designated heritage assets produced outside of a Neighbourhood plan? Because many Parish Councils like Sproughton do not have the present ability to produce a neighbourhood Plan.

**Q 55.   Are there any other approaches that the Joint Local Plan could take to protect the landscape?**

* It could agree to consult specifically on landscape impacts of developments more closely with local parishes much earlier at initial approach of developers.
* It could agree to apply the policies even-handedly regardless of developers size or financial influence.
* It is a simple fact that a single house may add to the richness of a landscape whereas an estate completely destroys it no matter how well it is integrated and yet the council appears to enforce landscape policies on small or single builds that have little impact but will bend the rules for a big developer.
* Due to the potential impact the bigger the development the more robust the landscape policies should be enforced.

**Q 56.   Should additional protection be given to areas which form part of a landscape project area but which aren’t designated?**

* My understanding is that the Stour valley is a Landscape Project Area, it is an extension of the Dedham Vale, so a bit like the gipping valley as it extends from Chantry Vale.
* Our thoughts are that it should be judged like any other landscape and if appropriate given the appropriate designation.
* Due to the similarity with Dedham etc. perhaps BMSDC should be consulting SPC to conceive a landscape project designation for Sproughton.

**Q 57.   How can the Joint Local Plan make the most of the heritage assets?**

* By ensuring the planning departments will enforce the appropriate policies as they were intended and developed over many decades of experience and local knowledge.
* We don’t know how important a heritage asset will be to future generations. Stonehenge lay abandoned for 5000 years! They should be cared for if we can, neglected if we can’t but never wilfully removed or destroyed

**Q 58.   What level of protection should be given to identified non-designated assets?  Are there any specific situations in which the balance should favour or not favour protection of identified non-designated assets?**

* These would be best identified by lists from Parish Councils.
* The logical answer would surely be each individual asset will be different and it would be best to consult and negotiate with the Parish Council supplying the list.

**Q 59.   Should a more flexible approach toward climate change objectives be adopted where this would assist in protecting a heritage asset?**

* If there is a clear defined heritage asset that may be compromised by enforcing some climate change policies then the planning department should have some scope to ensure the asset is not spoiled.
* A typical example might be where a listed building has steel framed windows that are part of its character. If some had to be replaced it would be appropriate to maintain that character rather than require energy efficient alternatives.

**Design**

Here the paper describes all the elements of design. i.e. character, interest, health/wellbeing, amenity, safety, accessibility, infrastructure, etc.

**Q 60. Is there any aspect of design that priority should be given to?**

* The typical Suffolk country side is dominated by diversity in design. This has occurred due to the passage of time but also because most building has taken place on small scales.
* The spirit of the market towns and Hamlet type communities is the prevalent character of Suffolk, and design would fit in better if more effort was made to blend in with this traditional character.
* The monotony of standard estate design does not lend itself favourably with the villages, towns or countryside of Suffolk and every estate built detracts from the character of the county.

Even in an estate development much more could be done to preserve the local character and provide visual interest and a village atmosphere. Perhaps a design policy worthy of inclusion would be for estates to be divided up into small separated design cells of around ten homes, similar to hamlets, and each cell should be sufficiently different as to give the impression of being built by a different developer, and even built in a different period. This would better match the character of our county.

**Q 61.    Is there any aspect of design that should be introduced to the Councils’ policies?**

* All development should be designed to blend into the countryside and community, protected or not, the dominant visual features should always be the landscape and local community character that existed before the development, not the development itself.
* As suggested in Q60 developments of more than ten houses could be grouped into cells

**Q 62.    Is there an area of design related to past development that you consider needs to be addressed in future development?**

* Our thoughts are of the Wolsey Grange application which had three story townhouses around its perimeter which would dominate the skyline both from the Chantry Vale valley, Chantry Park and the surrounding countryside. Apparently Taylor Wimpey’s did this to make the development a statement.
* The Suffolk one collage is similarly dominant. These are conceited and selfish aims completely at odds with the special landscape policy for that site, and the council policy to preserve the best of our views and landscapes. It is quite a disappointment to gaze around the green Suffolk countryside and have your vision drawn to a big white square building set on top of the biggest hill.
* Suffolk One should have its form broken up by the use of green shaded panels or bands to prevent its dominance of the landscape.
* It should be a design objective that buildings / developments should be blended into the landscape using every practical means. Typically by putting low rise buildings around its perimeter, and any desire to make a statement of a development should be restricted to design that does not impose itself on the landscape.
1. [↑](#footnote-ref-1)