

# Speech to Hopkins Homes Appeal Hearing

## Introduction

Sproughton Parish Council would like to thank the planning inspector for allowing us to put forwards our views on this appeal. Firstly we would like to put this development into context and then to expand on particular points made in the various 'rebuttals of evidence'. We will try not to repeat the points made in our response to you of 30 September 2020. Peter Powell, the Vice Chair will comment on Cumulative Impact & Heritage in the second half of our comments.

## Background

Sproughton is an ancient settlement on the banks of the River Gipping. There are local Neolithic flint works, some Bronze Age archaeological finds, a settlement in Saxon times and our High Street & Loraine Way are built over the main Colchester to Norwich Roman Road. The village really started to grow around the Grade II\* 14<sup>th</sup> century Church of All Saints in mediaeval times and gradually spread slowly south & west with a noticeable growth spurt southwards in the 60s & 70s. The northern village boundary is the only boundary left undeveloped - all other parts have had planning approvals or are likely to. This untouched boundary is formed by a collection of listed buildings all set within a Special Landscape Area. This Heritage Rich Rural Edge is treasured by the village and has remained untouched for several hundred years - if developed the view is gone forever and can never be replaced - that connection to our past will be lost. The site is a critical part of the rural setting of the group of 10 Grade II listed village buildings that cluster around the Church. The 2015 Babergh Landscape Character Type report recommends development should be on Plateau Farmland, typically along the A1071, in preference to Rolling Valley Farmland which this is.

## The Site Itself

We strongly object to this site being developed - over 350 objections to this application were made by parishioners. The neighbouring parishes of Burstall & Bramford also objected. This site has now made its way into the Pre-Submission Joint Local Plan (Regulation 19) document without any democratic public consultation - it was included in the original SHELAA to which parishioners & the parish council objected strongly and wasn't included as an allocated site in the earlier version of the JLP issued for public comment & scrutiny. Yet Hopkins Homes has put forward a speculative application and is obviously keen to railroad this application through despite being refused **twice** by the Babergh Planning Committee (at which the parish council & our two district councillors spoke against the application). We do not feel that Hopkins are at all concerned by the harm it will do to the village and the feelings of the parishioners - we are not against development in the right place but are against it in the wrong place. This has come out very clearly in our Neighbourhood Plan project where our 'pin the tail on the donkey' exercise at the September 2020 Public Exhibition shows no parishioners in favour of development on this site but in favour of development in other areas. Parishioners also want the village to stay a village and not merge with adjacent settlements. Out of interest the first draft of the Neighbourhood Plan should be out just before Christmas. Any weight given to the

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inclusion of the site in the JLP would be wrong as that inclusion hasn't been subjected to challenge or public scrutiny & is therefore unreliable. We have raised the inclusion of this site in the new Reg 19 JLP with our local MP & the Minister of Housing and will be endeavouring to overturn its inclusion in the JLP as will our District Councillors Zac Norman & Richard Hardacre I understand Cllr Norman may also be speaking on this topic.

## Settlement Hierarchy and Distribution of Housing Numbers in Babergh Core Strategy & the JLP

Sproughton PC do not feel that this site is needed - there will be a 105 house development on the other side of the road from this appeal site - 30 dwellings over the Babergh Allocation of 75. 475 houses are being built in the Southern tip of the parish and an application for a further 750-800 adjacent to the 475 is due shortly. A 30 house development in the centre of the village was completed this year. There are a number of smaller applications that have been granted but not yet built. Once all these additional dwellings have been built Sproughton will have essentially quadrupled in size and will have slunk towards the neighbouring parishes of Bramford, Burstall & Ipswich town (leaving a gap of just 512m between Sproughton & Bramford) - this is clearly the creeping coalescence the NPPF warns against.

Sproughton parish is picking up around an incredible 73% (1275 out of 1757) of the Ipswich Fringe housing requirement for Babergh to 2036<sup>1</sup>. We are mystified at Hopkins statement that the Pigeon Land Management Scheme for the 105 dwellings on the opposite side of the road<sup>2</sup> does not benefit from planning permission - the application was approved by Babergh Planning Committee on 07Oct20. We have been working with Jo Hobbs, a Babergh Planning officer on the conditions for this particular site and were told that this was targeted for completion on 30Nov20 to be closely followed by the decision notice - unfortunately this date has now slipped. However is it likely that conditions won't be agreed and the decision notice issued? **No, it isn't.**

The adopted Babergh Core Strategy (2014) makes provision for 2,500 new dwellings across the district with a distribution based on Settlement Hierarchy "where the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres..." The Core Strategy stated, in Policy CS2, that "Site allocations to meet housing and employment needs

Settlement Hierarchy	OPPs* (at 01/04/18)	New homes (2018-2037)	Total homes (2018-2037)
Ipswich Fringe	289	1,757	2,046 (21%)
Market Towns and Urban Areas	1,731	1,430	3,161 (33%)
Core Villages	1,288	1,411	2,699 (28%)
Hinterland Villages	582	284	866 (9%)
Hamlets	146	193	339 (4%)
'Windfall'	-	500	500 (5%)
<b>Total</b>	<b>4,036</b>	<b>5,575</b>	<b>9,611</b>

<sup>1</sup> \*Outstanding planning permission (% may not sum due to rounding)

<sup>2</sup> REBUTTAL TO PROOF OF EVIDENCE OF ALEX ROBERTS Prepared by Geoff Armstrong 2.0 Factual Error 'this site does not yet benefit from planning permission'

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may be made in the Site Allocations document where circumstances suggest this approach may be necessary." Clearly the approach in the 2014 Core Strategy was a spatial led approach based on the Settlement Hierarchy.

However, such an approach is not so clear in the Nov'20 version of the Joint Local Plan. Paragraph 08.04 of the JLP states that "the settlement hierarchy needs to be considered in combination with the Spatial Distribution. However, all settlements within each category are not equal, and there will be some variance in levels of growth dependent upon a number of factors, including the availability of suitable development sites, infrastructure capacity and considerations of the built and natural environment." Sproughton is defined as a Core Village. We bear little resemblance to a Core Village other than in the Parish's total size which is a consequence of absorbing so much historical housing growth without adequate services or infrastructure being introduced to support the village. The concept of a core village is a village with services that support surrounding lesser villages. We are classed as providing shopping facilities when in fact we have a small antiques shop, a community shop subsidised by the parish council & staffed by volunteers i.e. unlikely to survive if it was a commercial venture, no Post Office and the village pub has closed. Some families have to send their children to a primary school outside of the Sproughton catchment area due to insufficient capacity so the school is clearly not capable of supporting surrounding villages. For these reasons we will be endeavouring to overturn Sproughton's allocation as a core village in the new JLP. In the JLP we meet the definition of a 'core village' by one point - as the pub is now closed does that still count? Or does it put us into the 'Hinterland' category.

### **The Joint Local Plan Approach**

Policy SP04 identifies a requirement for 1,411 dwellings in Core Villages (excluding those sites that already had planning consent at 1 April 2018). Unlike the previous Core Strategy, the housing requirements set out in Policy SP04 appear to have been determined by the assessment for available sites in the Strategic Housing and Employment Land Availability Assessment (SHELAA) rather than identifying a broad level of growth across the Settlement Hierarchy. Babergh have allocated all the Sproughton housing sites that were concluded as being suitable in the SHELAA, suggesting that the Local Plan Strategy is determined by availability of sites rather than taking a higher-level strategic approach based on local housing need across over 70 different Parish and Town areas.

### **Cumulative Impact & Related Issues**

If this appeal is to be judged on the application as a whole we ask that you also take account of the amount of development targeted at surrounding parishes - it can be seen from the new JLP that there is a focus on development along the A12/A14 corridor to the West of Ipswich which if completed will increase the loading on an already overloaded infrastructure - increasing the pressure on roads, education, healthcare etc. Sproughton already grinds to a halt a rush hour, the HH development will add to this pressure. Then there are a number of issues raised by many in our community:- 1) coalescence with Bramford as this site will take our village right to

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Parish border in what is in effect a ribbon development running beside Loraine Way, 2) Wildlife & Ecology and the links of the Gipping River Valley SLA with the wider SLA countryside. 3) Sewage capacity of the system through the village which was not built for as many houses that are coming forward already resulting in overflows inflicted on the residents. 4) Overdevelopment of the village without adequate services to match,

### Heritage

We feel Hopkins have failed to consider the wider views and interactive setting of the 10 Grade II buildings Sproughton Hall, Tithe Barn, Root Barn, Church Close, All Saints Parish Church and their interaction across the site with the Historically linked Listed farm buildings in the wider landscape - The Grindle House, Thornbush Hall, Runcton House & Street Farm Cottage plus the mid-C14th grade I listed Bramford Church which when taken into account encircle this site and provide well established views from Bramford to Sproughton and vice versa. Historic England guidance, set out in 'The Setting of Heritage Assets', makes clear that having identified assets affected by a development and their significance it is necessary to minimise harm - this development is the exact opposite. Hopkins comment that they are 'creating new public views of heritage assets'<sup>3</sup> is disingenuous - the development will block most of the view and leave behind a sliver of a view - the people of Sproughton parish do not see how this can be regarded as a benefit. The report by Babergh's heritage expert goes into this in more detail and we will not repeat his points here.

### JLP Heritage Impact Assessment (HIA)

There are issues in the JLP HIA that support our concerns. In the Stage 1 Strategic Appraisal we were amazed that this site was included in this appraisal when the JLP had already disclosed its preferred sites with no inclusion of this site or any disclosure of this for public consultation. The adverse impact for this site was described in restrained terms as having a '*possible direct impact and setting change*' or '*potential visible setting change*' where as other sites were described in terms portraying more significant impacts.

Consequently this site was put forward for Stage 2 HIA assessment after Stage 1 was completed in May 2020, after this application had been rejected for the second time and Hopkins were already putting together their Appeal case but this was not even disclosed to councillors until Mid November just before the final version of the JLP was published ready for its final vote.

In stark conflict to Stage 1 stage 2 gives this site the greatest cumulative adverse impact of any other site considered across both districts. The LA051 Bottesdale and Rickinghall site which had as high but not as cumulative adverse impact was rejected at this point but not so the Loraine Way site. What is more any other site approaching the levels of cumulative High & High/Medium adverse impact were recommended to provide much longer open/visual spaces/separations than that recommended for this site.

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<sup>3</sup> Quote from REBUTTAL TO PROOF OF EVIDENCE OF STEVEN STROUD Prepared by Geoff Armstrong – Executive Summary

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But even so the recommended separation areas do not match the Hopkins Application which extends further into the middle of the field and around the South of the site.

Our District Councillors objected as to how the Hopkins site was included in the JLP but the argument we have had sight of, is that it is not an endorsement of this appeal, or meant to undermine the Babergh Planning Committee. But, it was included against the possibility that some other application may come forward in the future that is suitable. Also it was felt that there would be an opportunity still to object when it was examined by the Planning Inspector. But in relation to the approval of the new JLP this was presented as the completed document to go before the planning Inspector either for approval or rejection as a whole along with a document directing Councillors quite clearly expressing dire consequences for the council if it was not approved<sup>4</sup>.

Consequently, Our District Councillors are not endorsing this site in the JLP and it is acknowledged that the BMSDC JLP does not endorse this application, that the inclusion of this site and the HIA has not been subjected to public or councillors scrutiny and that opportunity will arise when the JLP is examined by the Planning Inspector. Sproughton Parish Council has a duty to represent the very strong community objection to this site and will therefore pursue every available avenue to do that. But it would be a double injustice if this Appeal was granted having been given weight TO the inclusion of the site in the JLP before anyone is allowed to pursue that objection.

Another concern is that all the heritage reports ignore the significance of the field itself and the hedgerow beside Loraine way. As this follows the ancient Roman Road it is older than anything else in the village. It has been neglected by the present and previous owners. It is completely overgrown as are several other nearby ancient hedgerows. Properly maintained and preserved these hedgerows should be much lower affording views both into and out of the field across the countryside towards the surrounding farmland and listed farmhouses. That is their natural setting. The value of the hedgerow beside Loraine Way and its relationship with the historic village edge is completely overlooked as is the potential relationship with the surrounding listed farmhouses due to its lack of proper maintenance.

### Summary

To Summarise our objections 1) there is no need for this site, 2) the cumulative impact of the Pigeon & Hopkins site will lead to Sproughton practically joining up with Bramford, 3) Sproughton PC feel that the inclusion of the site in the JLP without consultation or scrutiny is unjustifiable & unsupportable and should be given no weight & 4) the heritage impact is significant - once developed the damage cannot be remedied.

We ask that you dismiss the appeal and allow the only undeveloped edge of Sproughton to be left alone saving the hundreds of years old heritage views for our future generations.

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<sup>4</sup> BABERGH AND MID SUFFOLK - DRAFT JOINT LOCAL PLAN AND STATEMENT OF COMMUNITY INVOLVEMENT ADDENDUM