

WEST SUFFOLK LOCAL PLAN
ISSUES AND OPTIONS CONSULTATION
Representations of Cavendish Parish Council
December 2020

Cavendish Parish Council (CPC) has carefully considered the contents of the Issues & Options Consultation documents and wishes to register the following representations:

Part 1: Developing a Spatial Strategy

CPC agrees with and supports the definition of Local Service Centres (para.5.33) and the Draft Settlement Hierarchy (para. 5.38). It also agrees that Cavendish is correctly classified as a Local Service Centre.

CPC do not consider that the definition of Option 3 accurately reflects a situation whereby housing site allocations are under active consideration within all but one of the 13 Local Service Centres. This Option puts forward a strategy for focusing growth in the Towns, Key Service Centres and Local Service Centres only through *"urban extensions and infilling"* - failing to mention *"allocations"*. CPC therefore consider the wording of this Option should reflect the fact that allocations as well as infilling may be suitable in certain Local Service Centres. That said, however, CPC nevertheless lend strong support to the important caveat: *"where infrastructure and environmental constraints allow"* - as it is vital that the amount of growth directed towards rural settlements should reflect their varying ability to absorb growth.

CPC comment further on the allocations under consideration within its Parish in its response to Part 3: Settlements, but on balance consider that Option 3 reflects the best strategy for future growth. It also sees merit, however, in Option 4 which would allow limited growth to sustain the smaller villages as well as Service Villages. As the aims of Options 3 and 4 are not mutually exclusive, consideration could therefore be given to a hybrid strategy which combines these Options.

Part 2: Local Issues

CPC support the housing aims found in paras. 3.14 - 3.16 in that it considers it important that future rural housing should adequately reflect the needs of existing rural communities and provide for a diverse range of dwelling types and tenures. This aim is not only justified in its own right but is regarded as a key factor in maintaining rural services and, in particular, helping to ensure that village schools remain viable and continue to contribute to the vitality of the communities they serve, as is the case in Cavendish.

Part 3: Settlements

CPC support an appropriate level of growth in order to contribute to District-wide as well as local housing needs and acknowledge that such growth is able to help sustain existing village services and facilities - including public transport. The requirement that the scale of growth should be governed by infrastructure and environmental constraints is nevertheless key and hence to the forefront of CPC's mind when considering the two draft allocations put forward at Cavendish.

WS057: Blacklands Field

CPC **strongly object** to this draft allocation on the following grounds:

Scale: A housing development of this magnitude - 82 dwellings - is regarded as excessive and disproportionate to the existing size of the village. It is substantially larger than the village's largest housing estate (Peacocks Close) and alone would give rise to an estimated increase in village population of nearly 20%. Housing developments of this scale are regarded as more appropriately directed to the Towns and Key Service Villages.

Landscape Impact: The site is located on higher ground on the northern edge of the village and in an exposed position on the side of the Stour Valley. A large housing estate here would be prominent and intrusive in the valley landscape and difficult to integrate into the open countryside through landscaping. The rural setting of the village would be materially harmed.

Highways & Traffic: Access to this site is substandard - Peacocks Road at this point being a narrow country lane whilst further south the roadside pavements are not connected. All traffic generated by this development would be funnelled through the village centre whilst exacerbating highway dangers en route. In particular, there would be increased highway danger at Nether Hall crossroads which suffer serious visibility splay deficiencies and in the vicinity of the church – where there are already parking difficulties and highway hazards associated with picking-up and dropping-off children attending the village primary school. The increased traffic flows would also be detrimental to the Conservation Area and add to the existing heavy traffic flows passing through the centre of the village along the A1092.

Infrastructure: There are concerns that development of this scale would require major upgrading of the village's drainage system and would otherwise exacerbate existing problems.

CPC consider that large scale development on this site constitutes the least favourable location for any edge-of-village growth and, if permitted, would be of a disproportionate scale and have a major detrimental impact on the character and environmental quality of the village as well as on highway safety and existing infrastructure.

WS058: Land at the end of Nether Road

CPC note that this site already lies within the Housing Settlement Boundary of the currently adopted Local Plan and is shown as Site RV16 (a) on the Local Plan Policies Map and within the Cavendish Conservation Area. Notwithstanding its longstanding allocation, the site has not come forward for development. Prior to its allocation, CPC registered concerns that the erection of up to 10 houses on this site would exacerbate highway hazards at the Nether Hall crossroads and that access to the site was restricted for a standard estate road. Also, that the line of a definitive footpath crosses the site albeit that alternative footpath routes were now used. Concerns were also expressed by other parties relating to the need to exclude the Nether Road - Bowling Green footpath from the development area and that there would be a loss of views towards the church.

All in all, therefore, having regard to the constraints referred to above, CPC consider a site capacity of 10 dwellings would be excessive and the capacity of this site should be restricted to a maximum of 5 dwellings served by a private drive

Further Comments

CPC note that the capacity of the draft allocations under consideration for Local Service Centres amount to 4929 dwellings – almost double the minimum target of 2,600 additional dwellings for the entire District. Clearly the overall quantum of growth currently under consideration for Local Service Centres is excessive – especially under any strategy that envisages the lion’s share of growth being directed towards the Towns and Key Service Centres. Inevitably, therefore, there will need to be a severe reduction in the number and capacity of draft allocations in the Local Service Centres and a detailed re-assessment of the sustainability credentials of all such sites will need to be undertaken. As part of that re-assessment, we would expect WS057: Blacklands Field s in particular to fail the sustainability objectives found in the National Planning Policy Framework and thus be deleted from the draft Local Plan.

CPC is not opposed to growth as long as it is proportionate to the scale and needs of the village, it can be integrated into the form of the village without harm to its character and setting, and it does not place undue strain on village infrastructure or significantly increase existing traffic-associated problems. There are currently some opportunities for infilling and the release of small brownfield sites within the village and such “windfall” sites are able to make some contribution to local housing provision. In the event that some contribution is required on greenfield land, CPC consider, without prejudice, that the western approach to the village on land north of the A1092 possibly represents the most appropriate location for a limited number of additional market and affordable village houses. The A1092 at this point, however, lies within a flood risk area and it would need to be ascertained that access can be provided safely. A small cluster of new village houses here could nevertheless be designed to present an attractive entrance to the village and create an improved interface between the edge of the village and the countryside.

CPC would be grateful if the above representations could be taken into account in formulating the West Suffolk Local Plan.

Parish Clerk

December 2020