

## WOODBIDGE TOWN COUNCIL

Minutes of an on-line meeting of the PLANNING COMMITTEE held on TUESDAY 16<sup>TH</sup> JUNE 2020 at 6pm

### Councillors:

Present: S Bale, Lady C Blois, G Holdcroft, S Miller, E O’Nolan, R Sanders, M Sutton and C Walsh

Apologies: A Semmens

Absent without

Apologies: C Mapey

In Attendance: Locum Town Clerk

*Action*

### 80. APOLOGIES FOR ABSENCE

Apologies for absence had been received from Councillor Semmens.

### 81. MEMBERS AND OFFICERS WERE INVITED TO MAKE ANY DECLARATIONS OF DISCLOSABLE PECUNIARY OR LOCAL NON-PECUNIARY INTERESTS THAT THEY MAY HAVE IN RELATION TO ITEMS ON THE AGENDA AND WERE ALSO REMINDED TO MAKE ANY DECLARATIONS AT ANY STAGE DURING THE MEETING IF IT BECOMES APPARENT THAT THIS MAY BE REQUIRED WHEN A PARTICULAR ITEM OR ISSUE IS CONSIDERED, AND TO DEAL WITH DISPENSATIONS AS REQUESTED BY INDIVIDUAL COUNCILLORS IN LINE WITH S33 OF THE LOCALISM ACT 2011

No Members declared an interest in matters on the agenda.

### 82. COUNCILLORS WITH A PECUNIARY INTEREST IN AN ITEM ON THIS AGENDA, WHO WISH TO REMAIN, SPEAK AND/OR VOTE DURING CONSIDERATION OF THAT ITEM, MAY APPLY FOR A DISPENSATION BY WRITING TO THE TOWN CLERK PRIOR TO THE MEETING. APPLICATIONS MAY ALSO BE CONSIDERED AT THE MEETING ITSELF SHOULD THE NATURE OF THE INTEREST BECOME APPARENT TO A COUNCILLOR AT THE TIME OF THE MEETING

There were no requests for dispensations.

**83. PUBLIC QUESTION TIME**

There were no members of the public in attendance.

**84. CONFIRMATION OF PLANNING COMMITTEE MINUTES**

The Committee approved the signing of the minutes of the meeting held 2<sup>nd</sup> June 2020 as a true record.

**85. TO CONSIDER APPLICATIONS FOR PLANNING PERMISSION**

The Council agreed their comments as set out below: -

<b>Application No and Address</b>	<b>Committee Comments</b>
DC/20/1930/FUL – 64 Seckford Street	We recommend APPROVAL
DC/20/1975/TCA – 57 Ipswich Road	We recommend APPROVAL
DC/20/1929/FUL – 42 Chapel Street	We recommend APPROVAL subject to no objections from the Environmental Health Officer
DC/20/1894/FUL – 7 Little St Johns Street	We recommend APPROVAL
DC/20/1900/FUL – 48 Tennyson Close	We recommend APPROVAL
DC/20/1958/FUL – The Corner House, 1A Hasketon Road	We recommend APPROVAL
DC/20/1819/FUL – 10 Market Hill	The Committee agreed to defer a decision pending a site visit and to consider this application at their meeting on 30 <sup>th</sup> June.
DC/20/1526/FUL – 10 Market Hill	We recommend REFUSAL. The access to this site is poorly situated on a bend on a narrow road and involves demolition of part of a listed wall. The choice of materials is not in keeping with the street scene. Both of these issues are contrary to Policy SCLP7 and SCLP11.1. The Arboricultural Survey fails to identify the ancient and long-established mature trees whose roots will inevitably be affected by the development and for which there are no mitigation measures in the application. The steeply graded access will not only create issues in accessing the site but also lead to additional surface water run-off for which there are no measures for alleviation contained in the application.
DC/20/1957/AND - Queens Drive Land West Of Bredfield Street	We recommend APPROVAL

**86. TO AGREE THE DRAFT COMMENTS ON THE DRAFT MAIN MODIFICATIONS TO THE DRAFT LOCAL PLAN TO ADDRESS ISSUES RAISED BY THE PLANNING INSPECTOR**

The Committee thanked Councillor Sanders for his work in producing a draft response. The Committee agreed to recommend to Full Council that the Council's response should be: -

**Overview**

Woodbridge Town Council have reviewed the document entitled 'Suffolk Coastal Local Plan – Tracked Changed Plan Including Main Modifications and Additional Modifications -May 2020' which was presented for consultation on 1<sup>st</sup> May 2020.

Woodbridge Town Council have identified certain modifications within that document that it wishes to comment upon these being

- **Policy SCLP3.3 Settlement Boundaries**
- **Major Energy Infrastructure – various paragraphs**
- **Policy SCLP 3.4 Proposals for Major Infrastructure Projects**
- **Policy SCLP 3.5 Infrastructure Provision**
- **Policy SCLP 7.1 Sustainable transport**
- **7.2 Parking Proposals and Standards**
- **Policy SCLP 7.2 Parking Proposals and Standards**
- **Policy SCLP 8.2 Open Space**
- **Policy SCLP 11.1 Design Quality**
- **Policy SCLP 11.5 Conservation Area**
- **Paragraph 11.45 and 11.46 Parks and Gardens**
- **Deletion of Policy SCLP 11.9 Areas to be protected from Development**
- **Policy SCLP 12.33 Land at Woodbridge Town Football Club**

Detailed comments and recommendations are presented in the following sections. In the detailed commentary reference is made both deleted text from the Final Draft Local Plan as published in January 2019 and to new text in the 'Suffolk Coastal Local Plan – Tracked Changed Plan Including Main Modifications and Additional Modifications -May 2020'. For brevity the latter will be referred to as the 'new consultation document' hereinafter. Direct quotes from the former are in green text and from the latter in red. Where text remains from the January 2019 draft plan and direct quotes incorporated below, they are in purple text. Where Woodbridge Town Council proposes new text that text will be in brown.

Woodbridge Town Council would, in particular, draw attention to our views on the deletion of Policy SCLP 11.9 Areas to be protected from Development as it is our view the consultation process is compromised by this very late deletion of a

key policy. Woodbridge Town Council calls for the consultation process to be halted until such time as adequate review is made of how certain areas of land now excluded from policies can be safeguarded.

### Detailed Commentary

#### Policy SCLP3.3 Settlement Boundaries

In the Final Draft Local Plan (January 2019) any development outside settlement boundaries as defined on the maps accompanying that document was to be *'strictly controlled'* see paragraph 4. in accordance with NPP guidance and the strategy for the countryside. Woodbridge Town Council understood this to mean that there would be a strict limitation to such development to prevent coalescence of settlements occurring.

In the new consultation document the above wording has been replaced by *'carefully managed'*.

Woodbridge Town Council is concerned these amended words has moved the emphasis of the policy from one of strict limitation to a more *laissez faire*, permissive approach which would potentially allow the coalescence of settlements. **Woodbridge Town Council thus objects to the revised wording.**

#### Major Energy Infrastructure Various Paragraphs

##### Paragraphs 3.57

The wording in the Final Draft Local Plan (January 2019) required such infrastructure development which are likely to impact on existing and future generations to definitively led to economic, environmental and community benefits. In paragraph 3.57 it refers to such benefits *'will need to be delivered'*. This wording has been replaced in the new consultation document by *'may be required'*.

Woodbridge Town Council considers this is a substantive, and unacceptable, downgrading of the previous commitment to ensure an overall economic, environmental and community benefit from such developments. Developers putting forward proposals linked to, or part of, a major energy infrastructure project will be able to argue for no local economic, environmental and community benefits on the basis their scheme does not impact the community or environment sufficiently in isolation from other schemes or they cannot afford such benefits for their particular development.

##### Paragraph 3.55

In the new consultation document the wording in lines 9 -12 *'Impacts on the historic environment should be avoided, and if not possible, minimised. Opportunities to co-locate infrastructure may reduce impacts, and there may be opportunities to enhance the setting of assets through restoration after*

*construction, operation and decommissioning*' lacks a positive definition of an obligation on applicants.

Woodbridge Town Council consider that the following change is required to bolster commitments to minimise impacts

*'Impacts on the historic environment should be avoided, and if not possible, minimised. Where opportunities exist to co-locate infrastructure ~~may~~ they will be encouraged to reduce impacts, and where there ~~may be~~ opportunities exist to enhance the setting of assets through restoration after construction, operation and decommissioning they shall be adopted.'*

#### Paragraph 3.59

This paragraph remains unchanged but Woodbridge Town Council believes the commitment therein to *'ensure the most successful outcome are achieved'* is substantively compromised by the alteration to paragraph 3.57.

In light of the above Woodbridge Town Council strongly objects to the revised wording in paragraph 3.57 and recommends the adoption of proposed wording to paragraph 3.55.

#### Policy SCLP 3.4 Proposals for Major Infrastructure Projects

The new consultation document amendment in the third paragraph at line 2 is now grammatically flawed as the word *'will'* is inappropriate due to the added words *'have regard to'*. As the subject matter is a third party's proposals it should be substituted by *'must'* or *'shall'*.

The wording under b) in the January 2019 Final Draft Local Plan was for packages of local community benefit *'to offset and compensate'* for *'the burden and disturbance experienced by the local community'*.

The new consultation document has amended this to *'mitigate the impacts of ....disturbance'* which removes a requirement for the developer to compensate for the burden imposed on the local community. This is a substantive downgrade by East Suffolk Council of support to its local communities impacted by such energy developments.

Woodbridge Town Council is of the view this approach is too developer focussed and is a failure by the East Suffolk Council to support its electorate. **Woodbridge Town Council objects to this modification of the Local Plan.**

In the same paragraph under i) the new consultation document substantially alters the implicit obligation and grammatic sense of the wording, the latter in a similar manner to line 2. The obligation on the developer, in the Final Draft Local Plan of January 2019, to deliver positive outcomes for the local community and

surrounding environment is removed by deletion of the word *'are'*. The substitution of the word by *'will seek'* is grammatically inappropriate. It places no implicit obligation but assumes an undertaking over which East Suffolk Council has no control. **Woodbridge Town Council objects to this modification of the Local Plan.**

### **Policy SCLP 3.5 Infrastructure Provision**

In paragraph 2 line 2 the new consultation document reduces the obligation of developers to contribute to infrastructure to an *'as necessary'* status. This is in direct conflict with the preceding paragraph 3.64 which remain unaltered and states *'All new development has a responsibility to contribute towards the cost of new infrastructure'*

### **Policy SCLP 7.1 Sustainable transport**

**Woodbridge Town Council commends the addition of paragraph 2c) to the Policy.**

The requirement in paragraph 2 f) of the January 2019 Final Draft Local Plan for developers to *'improve public transport in rural areas of the District'* has been removed which Woodbridge Town Council believe is a retrograde step where local town centre hubs of employment are likely to continue to have inadequate provision of housing for lower paid workers.

Woodbridge Town Council has noted that the new consultation document has added a requirement for development incorporating the following two paragraphs *'Development will be expected to contribute to delivery of local sustainable transport strategies for managing cumulative impacts of growth'* and that *'opportunities to improve provision or access will be supported'*.

Woodbridge Town Council consider that the wording of the first paragraph is ambiguous. It could be readily interpreted, particularly when read with the second new paragraph, to mean only a contribution to delivery of a strategy within a document. **Woodbridge Town Council strongly recommends the removal of the word *'strategies'* so that it is abundantly clear it is delivery of sustainable transport.**

The second new paragraph provides no requirement for provision or access to sustainable transport but relies on the good will of a developer. The wording thus has no teeth and is too developer focussed. **Woodbridge Town Council recommends the removal of the second new paragraph or the replacement of *'supported'* by *'expected'*.**

### **7.2 Parking Proposals and Standards**

The additional wording in the new consultation document's revised paragraph 7.18 downgrades the importance of standards in SCC document 'Suffolk Guidance for Parking'. They are now stated to be *'the principle starting point'* rather than

standards required as is readily implicit in the first part of the paragraph. The author's regular use of the word 'standards' also implies that they are not guidance on which a view may be taken. Whilst the additional wording does require evidence to be produced as to why a standard *'is not applicable'* there is no reference to how substantive the evidence needs to be. SCC document 'Suffolk Guidance for Parking' 3<sup>rd</sup> edition 2019, which has been written to comply with NPPF guidance, refers on page 34 under '5 Parking Guidance in Urban Areas to only considering relaxation on the basis 'Such developments must be designed to provide exceptional standards of sustainable transport'.

**Woodbridge Town Council objects to downgrading of standards to mere guidance. Further if that objection to the whole of the new wording is not accepted, Woodbridge Town Council strongly recommends that the word 'substantive' is added before 'evidence'. Woodbridge Town Council further recommends for there to be joined up strategy across interfacing planning authorities the Local Plan should utilise wording which ties in with SCC document 'Suffolk Guidance for Parking.'**

and that the wording includes the above extract from the.

#### **Policy SCLP 7.2 Parking Proposals and Standards**

In the final paragraph of this policy the new consultation documents revised wording reflects the downgrading evident in paragraph 7.18 in that the need for developer proposals to meet parking standards is optional. The developer only has to *'have regard to'* those standards. There is little point in having standards, which are implicitly obligatory, if they are openly stated to not be a required standard.

**Woodbridge Town Council objects to the additional wording in the final paragraph of this Policy.**

#### **Policy SCLP 8.2 Open Space**

in paragraph 1 line 5 the requirement on developers to contribute to provision of open space and recreational facilities has been amended to an expectation which open the door to developer's arguments of an inability to afford to contribute. Open space is a necessary important prerequisite to community mental and physical well-being as stated in unchanged paragraph 8.10.

**Woodbridge Town Council objects to the downgrading of a requirement to an expectation for developers to contribute.**

#### **Policy SCLP 11.1 Design Quality**

In paragraph 2 h) the new consultation document sentence addition and deletion of previous text is applauded and **Woodbridge Town Council support this change to the policy.**

The change in the first line of penultimate paragraph reduces the obligation on developers of major residential developments in relation to Building for Life 12 guidelines. In the January 2019 Final Draft Local Plan this was *'required'* but in the new consultation document is only *'expected'*.

Woodbridge Town Council object to the revised wording of the penultimate paragraph as it downgrading the requirement for quality built on major residential developments. Such developments are those it considers most able to afford to meet Building for Life 12 guidelines.

#### **Policy SCLP 11.5 Conservation Area**

The addition of paragraph 3 in the new consultation document removes the obligation, where a development affects the setting of a Conservation Area , to *'Preserve or enhance the character of the Conservation Area'* and *'Retain features important to settlement form and pattern such as open spaces...'*. Woodbridge Town Council considers this allows development to harm the character of the Conservation Area including impacting on important aspects such as of green spaces around the Conservation Area.

Woodbridge Town Council objects to the addition of the third paragraph in this policy.

Woodbridge Town Council supports the amendments to the fourth paragraph of the new consultation document as it reinforces its desire to retain non-listed buildings providing a positive contribution to a Conservation area.

#### **Paragraph 11.45 and 11.46 Parks and Gardens**

Paragraphs 11.45 identifies that in addition to specific Designated Heritage Assets, of which Woodbridge Cemetery is one, 21 additional parks and gardens exist in the plan area which are also deemed Historic Parks and Gardens as defined in Suffolk Coastal 1995 Supplementary Planning Guidance SPG6.

The Designated Heritage Assets, including Woodbridge Cemetery, and 17 of these are now covered by **Policy SCLP 11.8 Parks and Gardens of Historic or Landscape Interest**.

With the intended removal of **Policy SCLP 11.9 Areas to be protected from Development** , unless that removal is rescinded, Woodbridge Town Council wish consideration to be given to designating some areas covered by the former Policy 11.9 as Parks of Gardens of Historic or Landscape Interest. Paragraph 11.45 however set a minimum area of 50 hectares, although paragraph 11.46 is somewhat less prescriptive in its wording and confused in other ways (see below).

A minimum area of 50 hectares would preclude the areas which Woodbridge Town Council wish to be considered, these being the Abbey School Grounds,

known to be part of the estate of historic Priory of the Auston Canons and home to Thomas Seckford, and Fen Meadow, an area of considerable landscape interest in its own right. Woodbridge Town Council due to COVID 19 are unable to determine if the latter was part of the former as Suffolk County Council's Suffolk Archives (the former County Record Office) is closed. From a landscape perspective Fen Meadow is the only undisturbed remnant in Woodbridge of the side valley structure to the River Deben defined by the spring line interface of the Red Crag overlying the London Clay Formation.

The criteria in 11.46 is confusing. In the first set of bullet points it is not defined whether existing Historic Parks and Gardens have to comply with all, or just some or just one of the bullet points. The words 'and', 'either' or 'or' are not used. Similarly, as currently worded with the word '*and*' after '*kitchen gardens*', after '*landscape*' and after '*setting*', the second set of bullet points appear to require all these features to be present for an area to be deemed an Historic Park or Garden.

The third set of bullet points is better defined but we would seek the '*and which continues to display remnants of that former park*' to be removed

Woodbridge Town Council Woodbridge Town Council is of the opinion that the late deletion of Policy SCLP 11.9, confuse wording of Paragraph 11.45 and 11.46 Parks and Gardens and COVID 19 related restrictions on access to documents of relevance to apply for land to be deemed covered by Policy 11.8 severely hinders its ability to adequately review the Local Plan within the prescribed consultation period.

Woodbridge Town Council thus calls for the consultation to be halted until such time as there is both clarity of criteria related to policy and access to historical documents.

#### **Policy SCLP 11.9 Areas to be protected from Development**

This policy incorporated in all previous drafts of the Local Plan has been deleted in its entirety. There is no evidence that an attempt has been made to review those areas no longer to be protected by the former Policy 11.9 to preserve areas of particular importance to local communities. Our understanding of the following abstract from East Suffolk Council's letter of 14 February 2020 to the Planning Inspectorate is that it had decided to not provide evidence to support the retention of Policy 11.9.

*'In response to your concluding paragraph, the Council is fully committed to adopting a sound Local Plan as soon as practicable and we will not be requesting any additional time in connection with the matters on which you have offered the opportunity for more evidence to be prepared. The Council will not be preparing additional evidence in relation to Areas to be Protected from Development.'*

This is in our view a regrettable approach and one that was not communicated to local town and parish councils on this decision.

We also consider it unreasonable that the Planning Inspectorate deem it appropriate to require the deletion of this policy in its letter of 31 January 2020, at this late stage of development of the Local Plan.

Woodbridge Town Council are advised that such spaces could be so protected by incorporation of them in a Neighbourhood Plan as Local Green Spaces. Such spaces may also be able to be protected by designation under other policies, but this is likely to require access to Suffolk County Council's Suffolk Archives (the former County Record Office). All branches of that organisation have been closed since the new consultation document has been published.

In Woodbridge Town Council's view the belated, and disturbing, late stage deletion of a key local planning policy negates the ability of towns and parishes such as Woodbridge Town Council to prepare and have approved a Neighbourhood Plan that protects such areas prior to the expected adoption date of the Local Plan. This is unacceptable.

**Woodbridge Town Council strongly objects to the deletion of Policy SCLP 11.9 Areas to be protected from Development.**

Woodbridge Town Council is of the opinion that the late deletion of this Policy associated with

- the impossibility of preparing, and getting approved, a Neighbourhood Plan to address issues arising from the deletion prior to adoption of the Local Plan
- restrictions on access to documents of relevance due to COVID-19

means the consultation process is compromised

Woodbridge Town Council thus calls for the consultation to be halted until such time as an acceptable means of addressing the impact of the deletion of Policy SCLP 11.9 Areas to be protected from Development is achieved.

**Policy SCLP 12.33 Land at Woodbridge Town Football Club**

Woodbridge Town Council commends the amendments to this policy. The amendments reflect the importance of maintaining the Football Club activity at all times during any future move to a new facility as this is essential for its funding and long-term survival as an important recreational facility for Woodbridge and surrounding parishes.

The Committee also agreed to issue a press release highlighting its concerns and circulate the recommendation to those Parishes which had requested sight of it.

**87. CLOSURE**

The meeting was closed at 7.22pm.

Councillor Miller  
Chairman