WOODBRIDGE TOWN COUNCIL

Minutes of an on-line Meeting of the TOWN COUNCIL held on TUESDAY 23RD JUNE 2020 at 7pm

Councillors:

Present: S Bale, Lady C Blois, P Gillard, G Holdcroft, J Jewers (items 1 – 17 only), C Mapey, S Miller, E O'Nolan, R Sanders, A Semmens, M Sutton, S Thompson, C Walsh and M Wilks

Apologies: M Sylvester and S Rawlings

In Attendance: Locum Town Clerk, Deputy Town Clerk, County Councillor Page and sixteen members of the public

Action

88. APOLOGIES FOR ABSENCE

Apologies for absence had been received from Councillor Sylvester and Councillor Rawlings, as well as District Councillor Yule.

89. 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

Councillors Holdcroft and Mapey declared non-pecuniary interests in item 103 as they were Directors of Choose Woodbridge.

Councillor Sutton declared a non-pecuniary interest in items 106 and 112 as he was a Director of the Woodbridge Riverside Trust.

Councillors Sanders declared a non-pecuniary interest in item 97 as a Member of Woodbridge Rotary.

Councillors Bale, Gillard, Semmens, Holdcroft and O'Nolan declared non-pecuniary interests in item 104 as Trustees of the Tide Mill Trust.

90. 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 dispensation.

91. TO AGREE AND APPROVE THE MINUTES OF THE MEETING HELD 12th MAY 2020

Subject to amendment of the following items, the Council agreed and approved the signing of the minutes of the meeting held 12th May 2020 as a true record: -

a) Item 10 amend "Finance and Staffing" to "Finance"
b) Item 11 insert "Disciplinary/Grievance Sub-Committee and" before "Appeals"
c) Item 13(a) amend "those two new sub-committees" to "the Disciplinary/Grievance and Appeals sub-committees"
d) Item 28 delete "Director of Choose Woodbridge" and replace with "Director of Woodbridge Riverside Trust"

92. TO RECEIVE A PRESENTATION FROM NAOMI KEEBLE AS TO HOW THIS COUNCIL CAN SUPPORT THE AIMS OF THE BLACK LIVES MATTER CAMPAIGN

The Council received a joint presentation from Naomi Keeble and Harry Raithatha as to how this council could support the aims of the Black Lives Matter campaign. Several Councillors expressed dismay at the hidden racism in the town which had come to light as a result of the current campaign.

The Council agreed that: -

1. The Mayor issue an open letter from the town council in support of BLM, showing as a community in Woodbridge we value black lives and they will be celebrated.
2. The story of Thomas Clarkson be re-told and promoted to the people of Woodbridge (and beyond) as many may be unaware of his influence in the abolition of slavery.
3. The council provide support and assistance in conducting a community art piece on BLM. Perhaps using an area near the skatepark in Woodbridge, involving pupils of Farlingaye and Woodbridge Schools as well as local artists.
4. The council provide initial leadership and support to create some form of community group/workshop which welcomes young people and invites public to come and discuss racism, the BLM movement and other important issues as well as providing a safe space which can be used to be reflective of ourselves whilst also educating each other on becoming anti-racist.
5. The next newsletter would include a list of UK based anti-racism charities which can be donated to and brief information on the work they do.

93. PUBLIC QUESTION TIME

A member of the public volunteered herself to be involved in any community group being formed which involved young people.

94. TO RECEIVE A REPORT FROM COUNTY COUNCILLOR PAGE

The Council received a report from County Councillor Page.

The Council agreed to make a further submission to Suffolk County Council for the introduction of the town-wide 20mph scheme.

The Council also agreed to support Carer's Week in 2021.

95. TO RECEIVE A REPORT FROM DISTRICT COUNCILLORS MAPEY AND YULE

The Council received a verbal report from Councillor Mapey in his role as District Councillor. The Council noted that free 30 minutes parking would soon be implemented in Hamblin Road and Oak Lane car parks. Councillor Mapey was asked to investigate whether a half-day car park ticket was transferable between different car parks on the same day.

Councillor Mapey reported that using his District Councillor's allowance he had purchased the books on racism which had been on display at a shop in the town and had donated them to the library at Farlinghaye School.

96. TO CONSIDER REPORTS AND RECOMMENDATIONS FROM COMMITTEES AND SUB-COMMITTEES

The Council noted the receipt of the minutes of the following Committee meetings: -

a. Emergency Response of 18th May 2020
b. Planning of 19 May 2020
c. Emergency Response of 1st June 2020
d. Planning of 2nd June 2020
e. Emergency Response of 15th June
f. Planning of 16th June

97. TO CONSIDER, QUESTION AND AGREE THE FOLLOWING FINANCIAL REPORTS

The Council noted and agreed the following financial reports: -

a) Income to 31st May 2020 £176.190.00

b) Expenditure to 31st May 2020 £32,948.00
c) Income and Expenditure against Budget to May 2020
d) Bank Reconciliation and Supporting Bank Statements to 30th April 2020 £690,089.55 and 31st May 2020 £678,491.51
e) The Accounts and Payments List for June 2020 £31,340.86
f) The HSBC Net report for June 2020 £28,543.39
g) The HSBC Corporate Card report for May 2020 £14.39
h) Summary of Direct Debit payments to 31st May 2020 £309.55
i) Debtors Report to 31st May 2020
j) The Community Infrastructure Levy (CIL) payment of £3,940.90 received on 28th April 2020
k) The Precept amount of £162,914.00 received on 28th April 2020

98. TO REVIEW THE FINAL REPORT OF THE INDEPENDENT INTERNAL AUDITOR FOR 2019/2020 AND AGREE APPROPRIATE ACTION ON MATTERS RAISED

The Council reviewed the final report of the Independent Internal Auditor for 2019/2020 and agreed that when the budget for 2021/2022 is being set the Council allocate a sum to restore general reserves to a sum of £80,000.

The Council noted that appropriate action had already been taken on the matter raised regarding the delay in publishing the report of items of expenditure exceeding £500.

99. TO REVIEW THE EFFECTIVENESS OF THE INTERNAL AUDIT PROCESS

The Council reviewed the effectiveness of the internal audit process and agreed that no further action was required.

100. TO REVIEW THE APPOINTMENT OF THE INDEPENDENT INTERNAL AUDITOR

The Council reviewed the appointment of the Independent Internal Auditor and agreed to re-appoint SALC as its Independent Internal Auditor for 2020/21.

101. TO CONSIDER AND AGREE THE COMPLETION OF THE RESPONSES TO THE GOVERNANCE STATEMENTS IN PART 1 OF THE ANNUAL GOVERNANCE AND ACCOUNTANCY REPORT (AGAR) FOR 2019/2020

The Council considered and agreed the completion of the responses to the governance statements in part 1 of the Annual Governance and Accountancy Report (AGAR) for 2019/2020. All questions were agreed to be answered "YES" other than line 2 where the answer was to be "NO" because an increase in salaries had not been agreed by Full Council as required by Financial Regulations. The form was then signed by the Mayor.

102. TO CONSIDER AND AGREE THE FINANCIAL STATEMENT IN PART 2 OF THE ANNUAL GOVERNANCE AND ACCOUNTANCY REPORT (AGAR) FOR 2019/2020

The Council considered and agreed the financial statement in part 2 of The Annual Governance and Accountancy Report (AGAR) for 2019/2020. The form was then signed by the Mayor.

103. TO CONSIDER A REQUEST FROM THE WILD STRAWBERRY CAFE THAT THE COUNCIL WAIVE ITS FEE FOR THE USE OF MARKET HILL FOR 2020

The Council considered a request from the Wild Strawberry Cafe and agreed that the council waive its fee for the use of Market Hill for 2020 in view of the disruption caused by the pandemic.

104. TO AGREE THE GRANT APPLICATION FOR THE TIDE MILL TRUST

The Council agreed that a grant of £7,500 be made to the Tide Mill Trust.

105. TO AGREE TO CROWNLIFT A LARGE OAK TREE IN FEN MEADOW

Councillor Semmens declared a pecuniary interest in this matter as a neighbour.

The Council agree to seek further advice on the possibility of crownlifting a large oak tree in Fen Meadow in order to improve the light available to a nearby house.

106. TO AGREE THE DESIGNS FOR THE SURFACING OF WHISSTOCKS PLACE AND GIVE APPROVAL TO SUBMIT A PLANNING APPLICATION BASED ON THESE DESIGNS

The Council considered the designs for the surfacing of Whisstocks Place and agreed to give approval to the Council obtaining quotations for painting this surface in order that it may be considered further at a future Council meeting.

107. TO AGREE TO THE BI-ANNUAL CLEANING OF THE QUEEN VICTORIA STATUE

The Council agreed to the bi-annual cleaning of the Queen Victoria statue commencing in 2020.

108. TO AGREE TO REPAINT THE EXTERIOR OF THE KINGSTON PAVILION

The Council agreed to obtain quotations for the repainting of the exterior of the Kingston Pavilion. The Council asked that quotations also be obtained for the changing of the doors on the cafe frontage.

109. TO AGREE TO GRANT AN EASEMENT TO NETWORK RAIL IN TIDE MILL QUAY TO ENABLE THE INSTALLATION OF ESSENTIAL EQUIPMENT

The Council agreed to grant an easement to Network Rail in Tide Mill Quay to enable the installation of essential equipment, subject to all costs being met by Network Rail and the inclusion of a clause preventing permanent obstruction of the gates to the Sea Scouts land.

110. TO NOTE THE RECOMMENDATION OF THE STANDING ORDERS WORKING PARTY TO ADOPT THE FOLLOWING REVIEWED AND REVISED POLICIES

The Council noted the recommendation of the Standing Orders Working Party and agreed to adopt the following reviewed and revised policies: -

a) Standing Orders
b) Financial Regulations
c) Complaints Procedure
d) Data Protection Policy
e) Privacy Notice
f) Freedom of Information Policy

111. TO NOTE THE FOLLOWING DECISIONS MADE UNDER DELEGATED POWERS

The Council noted and approved the following decisions made under delegated powers: -

a) To plant up the area of Elmhurst Park around the flagpole - £726 ex VAT
b) To waive the rent on new Market traders during the COVID19 emergency
c) To combine the vacant ¼ allotment plots with adjoining (occupied) ¼ plots to make a useable area
d) To agree for funding for a new notebook for the Prescription Group of the Emergency Response Group Committee
e) To provide funding for scrubs kits for the Hygiene Group of the Emergency Response Group Committee
f) To repair the Elmhurst Park gardener's shed door
g) To remove the damaged (beyond repair) circular seat at Kingston Field
h) To re-open the ladies' toilet in Theatre Street solely for use by market traders (the gents toilet remains fire-damaged as we obtain quotes for insurance purposes)

112. TO RETROSPECTIVELY AGREE THE TERMS OF A LICENCE BETWEEN WOODBRIDGE RIVERSIDE TRUST AND WOODBRIDGE TOWN COUNCIL DATED SEPTEMBER 2019

The Council retrospectively agreed the terms of a licence between Woodbridge Riverside Trust and Woodbridge Town Council dated September 2019.

113. TO NOTE THE CURRENT SITUATION REGARDING THE LEASE OF PART OF THE FORESHORE AND AGREE ADDITIONAL FUNDING FOR INCREASED LEGAL FEES

The Council noted the current situation regarding the lease of part of the foreshore and agreed additional funding of £7,000 for increased legal fees.

114. TO AGREE A POLICY REGARDING THE USE OF THE COUNCIL'S LAND, BUILDINGS AND FLAGPOLES TO PROMOTE EQUALITY

The Council agreed to ask the Standing Orders Working Group to agree a policy regarding the use of the council's land, buildings, and flagpoles to promote equality.

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

The Council thanked Councillor Sanders for his work in producing a draft response. The Council agreed that the Council's response should be as set out below. The Council also agreed that the Chair of Planning should issue a press release drawing the public's attention to this consultation and its potential impact on Woodbridge.

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 1st 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
- 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 laisse 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' 3rd 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 utilises wording which ties in with SCC document 'Suffolk Guidance for Parking.'

Woodbridge Town Council thus recommends that the following words are added. *'Where parking provision below the recommendations in the Suffolk Guidance for Parking standard is adopted such developments must be designed to provide exceptional standards of sustainable transport'* so that there is

commonality between the planning provisions in the Suffolk County Council guidance document and the Local Plan.

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 is 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 are 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 adequate 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 entirely. 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.

116. IN ACCORDANCE WITH THE PUBLIC BODIES (ADMISSION TO MEETINGS) ACT 1960 TO EXCLUDE THE PUBLIC AND PRESS FROM THE FOLLOWING ITEM IN VIEW OF ITS CONFIDENTIAL NATURE

In accordance with the Public Bodies (Admission to Meetings) Act 1960 the Council agreed to exclude the public and press from the following item in view of its confidential nature.

117. TO RECEIVE AN UPDATE ON THE LEASE NEGOTIATIONS WITH THE CROWN ESTATE COMMISSIONERS AND AGREE FURTHER ACTION – SEPARATE CONFIDENTIAL REPORT

The Council received an update on the lease negotiations with the Crown Estate Commissioners and agreed that negotiations continue.

118. CLOSURE

The meeting was closed at 9.44pm

Councillor Bale
Chairman