

Monday 20th February 2017

PLANNING APPLICATION B/17/00091 – Erection of up to 24 dwellings (including 8 affordable dwellings) with access / Land to the south of Daking Avenue, Boxford

Submitting objections with reference to Babergh District Council's LOCAL PLAN 2011 – 2031 – CORE STRATEGY & POLICIES document (February 2014)

PLEASE NOTE:

In the context of the National Planning Policy Framework (NPPF) there is a PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT.

POLICY CS1 states: "(Babergh) will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible." "Planning applications that are supported by appropriate / proportionate evidence and accord with the policies... will be approved without delay, UNLESS MATERIAL CONSIDERATIONS INDICATE OTHERWISE."

If an objection is to carry any weight with the planning officer it must demonstrate that material considerations do apply – and that "any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits...".

Boxford has been designated a CORE VILLAGE in the Core Strategy and Policies document. SECTION 2.1.3 states, "Core Villages have been defined as such not because of size or potential opportunities for growth but BECAUSE OF THE ROLE THEY PLAY."

BABERGH POLICIES THAT COULD BE CITED IN OBJECTIONS TO THIS APPLICATION:

- CS1 – MATERIAL CONSIDERATIONS, as per the above, with specific reference to the following;
- CS2 - SCALE & LOCATION depend upon capacity of existing physical and social infrastructure... in regard to environmental constraints
- CS11 (all with reference to following policy CS15)
 - Appropriate SCALE & LOCATION
 - LANDSCAPE, HERITAGE, ENVIRONMENTAL CHARACTER
 - SITE LOCATION & SEQUENTIAL APPROACH TO SITE LOCATION (which I take to mean cumulative impact of multiple development)
 - CUMULATIVE IMPACT
- CS15
 - RESPECT LOCAL CONTEXT & CHARACTER
 - DEMONSTRATE PRINCIPLES OF SUSTAINABLE DEVELOPMENT
 - RESPECT LANDSCAPE, LANDSCAPE FEATURES, **STREETSCAPE** / TOWNSCAPE, HERITAGE ASSETS, IMPORTANT SPACES AND **HISTORIC VIEWS**
 - MAKE A POSITIVE CONTRIBUTION TO THE LOCAL CHARACTER, SHAPE & SCALE OF THE AREA
 - ENSURE APPROPRIATE LEVEL OF... INFRASTRUCTURE
 - MINIMISE EXPOSURE TO FLOODING
 - MINIMISE THE NEED TO TRAVEL BY CAR ("in particular proposals should protect and where possible enhance the landscape and heritage areas...")

- CS21
 - “develop sustainable places... with SAFE and healthy communities”
 - “Council will protect, safeguard and enhance existing services”
 - “All proposals for new housing... will be required to be supported by, and make ADEQUATE provision for, appropriate infrastructure... to ensure that the development is sustainable and of a high quality”

Definitions:

INFRASTRUCTURE – “facilities provided on a communal basis. “Transport; **roads**, rail, **footpaths**, cycleways””

SUSTAINABLE – the Government’s Sustainable Development Strategy “Securing the Future” (2005) says, “the goal of sustainable development is to enable all people... to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations”

Full “Babergh Core Strategy and Policies” document can be found online at;

<http://www.babergh.gov.uk/planning-and-building/planning-policy/local-babergh-development-framework/core-strategy-and-policies-dpd/>

ADDITIONAL SECTIONS FROM CORE STRATEGY AND POLICIES DOCUMENT;

What follows is a series of extracts from and observations on the content of the Core Strategy and Policies document.

It’s something of a “brain dump” and not comprehensive (or completely comprehensible without the context of having read the whole document) but, per the above Policy “notes”, is an attempt to reference sections of the Core Strategy document that will allow you to reference a subject area you feel passionately about and put it into the specific context of the Core Strategy’s own words and terminology.

To reiterate – if we align our feelings with an appropriate section of the Core Strategy document – preferably within a specific Policy – and quote section / policy numbers and Babergh’s own words then we are essentially asking Babergh’s planning department to “tick boxes” defined by their own rules and justify **why** your opinion doesn’t align with their policy.

The most practical and accurate way to use what follows would be to find an area or SECTION below that aligns with your own thoughts then access the full document online and read that specific section; this way you can see the full context.

If you are unable to access this online then please ask and we’ll attempt to provide a hard copy of the document – remember that there’s less than a week available to submit a response!

- Section 3 of the CS&P – presumption in favour of sustainable development
This will require finding the RIGHT BALANCE between three elements:
Planning for * prosperity (economic)
 - * people (social)
 - * places (environmental)
- Strong emphasis on planning for infrastructure provision alongside development (this application needs consideration of infrastructure because of Swan Street – but what can be done about Swan Street? Nothing?)
- 3.3.4 – environmental enhancement – inc. river valleys. How does this development enhance (or diminish) environmental resource?
- Does GF2 impact on the provision for open space agreed to in GF1 permission? What other agreed provisions have been ignored?
- Development in Boxford so far (except Riddelsdell Brothers application) doesn't focus on economic prosperity – is lack of “joined-up thinking” destabilising Babergh's desired balance?
- Section 8 – LOCAL ECONOMY STRATEGY & THE RURAL ECONOMY – (Policy CS3) – Rural areas & rural activities contribute significantly towards the economy (Policy CS17). Look at LGV and HGV use of Swan Street – additional congestion must have some direct and detrimental effect on this
- SECTION 1.3
Section 1.3.2 KEY ENVIRONMENTAL ISSUES
 - Risk from flooding, especially along river valleys and estuaries; important that risk to lives and property is not increased and that impacts are managed and mitigated – already a red flag re. flooding from the Environment Agency on this application. ? Cumulative impact of water run-off on river Box in centre of the village?

Section 1.3.2 – Adequacy of infrastructure

 - vii) negative impacts – disturbance of wildlife / changing a cherished view / creating congestion that affects both visitors and residents
 - viii) maintain and respect the character and quality of the built environment and safeguard the future of heritage assets (how many listed buildings on Swan Street??)

Section 1.4.2 – KEY ISSUES FOR GROWTH AND CHANGE

 - Growth must be “proportionate and sustainable”
 - i) individual capacity of communities to accommodate growth (N.B. no capacity on this side of Boxford because of Swan Street congestion)
 - iv) Appropriate infrastructure – “it is important that infrastructure needs are considered together with how new development will be accommodated”

Section 1.5 SPATIAL VISION

“Babergh will continue to be an attractive, high quality place in which to live and work, and visit..... a well connected network of places”

Section 1.6 OBJECTIVES FOR SHAPING BABERGH'S FUTURE

(With reference to policies CS11, 15 & 16)

Objective 6: Protect / conserve and enhance: local character; built, natural and historic environment including archaeology, biodiversity, landscape, townscape; **shape and scale of communities**; the quality and character of the countryside; and treasured views of the district

CRITICAL SUCCESS FACTORS;

- o i) development = well located
- o ii) the character and context of the landscape / townscape inspires and informs the development
- o iv) the scale and character of new development is appropriate to and well integrated into the settlement

Objective 8

(With reference to policies CS3, 11 & 21)

CRITICAL SUCCESS FACTORS;

- o iii) Development in other locations respects the cumulative scale of development elsewhere within the settlement and within the functional cluster

Section 2.2.2 LEVEL OF GROWTH AND DISTRIBUTION

- o Section 2.2.2.3 – “The preferred approach is to plan for growth” (So far, there doesn't appear to be a plan. Growth is accommodated on a case-by-case basis without any overall consideration for Boxford as a whole)
- o Section 2.2.2.5 – “The most important consideration when planning growth... is the provision or improvement of the necessary infrastructure to ensure that proposed development DOES NOT IMPOSE A BURDEN ON THE EXISTING COMMUNITY”
- o Section 2.2.3.4 – “The amount of housing growth... accommodated in Core and Hinterland villages will depend on their individual capacity to accommodate growth” (Focus here should be the difference between the capacity of Boxford as a whole and the capacity of individual proposed development sites)

SECTION 2.7.4

“The overall development strategy for Babergh is to provide for a sustainable level of growth of jobs and homes... to ensure that a better quality of life for everyone, now and in the future is achieved. Development... all need to ensure that the historic and natural environment is protected, together with locally distinctive characteristics of the towns and villages”

SECTION 3.2.1

"The NPPF advises that "plans and decisions need to take local circumstances into account"

- o i) protect and enhance the environment

SECTION 3.3.1.1

"Conservation Areas and historic buildings... which need protection and enhancement"

SECTION 3.3.3.1

"future development must be managed to RESPECT the key features and local distinctiveness

SECTION 3.3.4.1 – ENVIRONMENTAL ENHANCEMENT

iii) All new development will be expected to ensure its design, character and **scale** compliments its location and... will **enhance** the existing and surrounding environment"

SECTION 3.3.5.4

(With reference to policy CS15)

"... addresses locally distinctive characteristics which new development needs to respect... balance the needs of the community with the character, history and appearance of the environment. These are the qualities that local communities identify as being important to and often the very reason for living or working in that area..."

SECTION 3.3.6.1

"... to continue to conserve and enhance the heritage assets..."

- o v) Provide support and guidance... to ensure new development makes a **positive contribution** to local character and distinctiveness...

POLICY CS15

See above but please note specific comment from this policy) "In particular proposals should protect and where possible enhance the landscape and heritage areas..."

SECTION 3.6.1.1

"appropriate evidence required to support application / development" and "evidence is proportionate and therefore appropriate" (Does this application demonstrate proportionate and appropriate evidence?"

SECTION 3.6.2.3

"General Public... expects that associated infrastructure will be provided contemporaneously.... Objective of sustainable communities and affect quality of life

SECTION 3.6.2.5 notes that the Localism Act 2011 obliges developers to have a "duty to co-operate" with local people / representatives. Is this / has this been the case?

