Written Statement to accompany Swilland & Witnesham Parish Council Representation for Examination of the Suffolk Coastal Local Plan

Matter 3; Area Specific Strategies – Development Allocations for the Rural Areas;

Policy SCLP 12.71: Allocation for Residential Development, Mow Hill, Witnesham

1. Swilland & Witnesham Parish Council objects to Policy SCLP12.71 and the inclusion of this area within the parish Settlement Boundary. It objects on the grounds that Policy SCLP 12.71 is not sound because it is not justified, consistent with policy and premature;

2. Witnesham is being reclassified from a Key Service Centre to a "Small Village" in the proposed Local Plan Spatial Strategy and the allocation of 1.5ha of land for approximately 30 dwellings is considered inconsistent and not justified with the given policy “SCLP 5.2 - Housing Development for Small Villages” which considers " Residential development will be permitted in defined Settlement Boundaries where it is a) a small group of dwellings of a scale appropriate to the size, location and character of the village; b) infill development ( in accordance with Policy SCLP5.11)." Development of this open agricultural green field site for 30 dwellings would have a major impact on the character of this end of the village. The site falls within the WT2 landscape type identified in the Suffolk Coastal Settlement Sensitivity Assessment Volume 2 July 2018 as "The landscape is highly sensitive to development as the upper slopes are visually very prominent". Development of a site with 30 dwellings would be out of scale with the hitherto small scale development traditionally associated with the historic Witnesham Bridge area.

3. Witnesham already has agreed allocations or planning permissions for 44 dwellings.( Table 3.5) This is the fourth highest number for the 41 " Small Villages" listed in the District and higher than 10 of the 16 " Larger Villages" listed. There is no justification to increase this amount of development over the next five years to 74 dwellings (44+30) especially as this is mostly in the smallest part of the village (Witnesham Bridge) and furthest from the school. There have been previous attempts to develop parts of this site. In 2017 an application for 11 dwellings at the southern end was withdrawn, a resubmitted application for 11 dwellings was refused in 2018 and dismissed at Appeal in June 2018. The grounds for dismissal were mainly that the
development was considered as "development in the countryside" and "development outside the Settlement Boundary: but the Appeal Inspector did state against the appellants argument for need that "I am not satisfied it is necessary at this time to develop the appeal site." The First Draft Local Plan, July 2018 allocated a site of 1.17ha with 20 dwellings, the Final Draft Local Plan January 2018 allocates a site of 1.5ha and 30 dwellings. There seems to be no consistency and justification in this increased allocation of Policy 12.71. The 44 dwellings available in already agreed allocations or planning permissions should be considered to more than meet the village needs and its contribution as a "Small Village to District housing need.

4. There have been three significant planning changes in Witnesham since the Final Draft Local Plan was published and the Examination opened that the Inspector might note. Firstly, planning permission has been granted for 20 dwellings on the site allocated in Policy 12.72 albeit for an area extended from 0.7ha to 1.2ha. Secondly, the Parish Council has received notice from agents and planners representing the landowner of the Witnesham Saw Mills site of its intent to seek residential development of the disused and now vacant wood yard site on Mow Hill, Witnesham, opposite the northern end of Policy 12.71 site allocation. Initial plans for a development of between 20 and 30 dwellings have been presented and a copy of this has been forwarded to the Inspector. The Parish Council does not support this proposal for similar reasons as its objection to Policy 12.71. However the former Saw Mill site is a "brown field site" and integrated into its setting with a thick band of mature trees along its west, north and south boundaries. It is the only gap on the west side of Mow Hill which the Suffolk Coastal Settlement Sensitivity Assessment Volume 2, July 2018 describes as being "modern infill has resulted in a continuous settlement up and over the hill on the west side of Mow Hill, but it is not prominent as it is absorbed within well vegetated boundaries". The Parish Council feels it could be difficult to resist development of this "brown field site" and it therefore asks this to be considered as a preferable potential allocation for longer term future development in Witnesham rather than 30 dwellings on a "green field site" of Policy 12.71 opposite.

5. The third change is the proposed Ipswich Northern Route for which route options are currently out on consultation. All three route options pass through a part of Witnesham and the Parish Council is opposed to all three routes. One of the route options- the Middle Route cuts right through the village on the other side of Mow Hill, some 300m or so north of the Policy 12.71 site. This potential route and junctions with the B1077 will in all likelyhood require the loss of some homes and will be resisted by the Parish Council as strongly as possible.
However if the Middle Route does progress there is a possible alternative alignment close to the present route that would be through the middle of the Policy 12.71 site and the now vacant Saw Mill Site opposite. Again the Parish Council would strongly resist such an alignment but it would be premature to consider any development on the site of Policy 12.71 until the route of the Ipswich Northern Route is determined.

6. Taking in to account the above matters concerning the impact of Policy 12.71 on the "Small Village" of Witnesham and that the village has a high level of existing housing permissions/allocations there is no justification for Policy 12.71. In light of the issues concerning the possible Ipswich Northern Middle Route and the preferable potential of the Saw Mill site for possible future residential development, the Parish Council considers that the site Policy 12.71 should not be allocated in the current plan but could be considered if necessary along with other options in its first review in 5 years time.