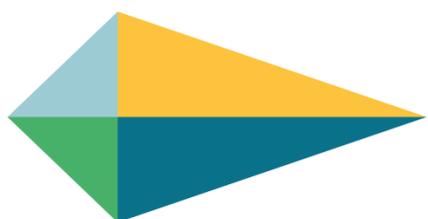


Responses to Bredfield Neighbourhood Plan

Further Consultation

Publicity period: 22 May to 12 June 2020



EASTSUFFOLK
C O U N C I L

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What is the purpose of this document?

Bredfield Parish Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being subject to independent examination.

In response to additional queries raised by the Examiner, Bredfield Parish Council provided some further information in relation to Policy BDP 9 of the Neighbourhood Plan. The correspondence between the Examiner and Council (including the additional information) was published for a further period of consultation from 22 May to 12 June 2020.

East Suffolk Council publicised these additional documents and invited representations to be forwarded to the examiner for consideration alongside the Plan. This document contains all representations received during the publicity period 22 May to 12 June 2020.

Anglian Water

Dear Sir/Madam,

Thank you for the opportunity to comments on the additional information relating to the Bredfield Neighbourhood Plan. The following response is provided on behalf of Anglian Water and should be read together with our earlier responses to the Bredfield Neighbourhood Plan.

Anglian Water does not have any comments to make in respect of the additional information provided for the site at Forge as highway matters are outside of our role.

I would be grateful if you could confirm that you have received this response.

Should you have any queries relating to this response please let me know.

B K Cook

Dear Mr High,

I would like to make the following comments on the latest letters between the Parish Council and you:-

1. The plans for the Forge and expansion into the field behind it would mean that there would be more traffic on Boulge Road. This would mean more delivery vans, towing vehicles, car transports and customers in their cars.
2. Many people, including me, use Boulge Road to walk for pleasure. Others use it to run and cycle. It is cycle route no.1. If there is more traffic on Boulge Road, it would be much more difficult or impossible to use it in this way.
3. Walking on Boulge Road would become much more difficult and dangerous with more traffic. There is no pavement and there are no streetlights.
4. With more traffic on Boulge Road, it will be much more difficult to pull out a car from my driveway into the road.
5. Boulge Road is just not wide enough for more traffic.
6. The Bredfield junction with the A12 is dangerous. Therefore, many cars exiting from the industrial site on Boulge Rd are likely to head towards Hasketon village to avoid it. It is a single lane country road all the way to Hasketon, not suitable for more traffic.
7. The junction at Woodbridge Rd and Boulge Rd, [REDACTED] involves a sharp left turn from Boulge Rd. The dangers here will increase with more traffic.
8. Although the Parish Council mentions the tractors and the bus already use Boulge Rd, the tractors only use the road at certain times of the year, as the farmers need to, while the bus is an essential lifeline to allow people like me to get into Woodbridge. We do not need more traffic on Boulge Rd.
9. Why do the proposed industrial units have to be built so close to my property?
10. If the extra traffic from the proposed industrial units use the A12 to exit Bredfield they will encounter 3 sharp bends. One close to the Forge, one at Weeping Ash and

the other at Potash Corner.

11. I really didn't think the Parish Council have taken into consideration the lives of those of us living in our part of the village.

I request to be notified of the Council's decision whether to accept the Examiner's recommendation and future progress with the plan.

I do not have a computer so please contact me by letter to the above address.

Clive Coles

I have read the response from the Bredfield Neighbourhood Plan group regarding the traffic problems being encountered in the vicinity of the old Forge site and sadly I find their observations somewhat misleading.

I was a member of the original Parish Plan working party and helped draft the statement which they quote below.

Our Parish Plan (2006) identified this and stated that ... “The business generated around the Forge in Woodbridge Road is causing difficulties - the problem is identified as cars parking in the road, which force motorists to pull over into the other carriageway as they approach a sharp left hand bend.” And indeed I confirm there was an action for a resolution of this problem ~ something that has never subsequently been addressed.

But to suggest that the proposed redevelopment of the old Forge site, together with the additional commercial development on the field behind the adjacent residential properties, could resolve this traffic problem is highly questionable.

The suggested location replaces the old Forge Buildings with possibly up to 10 homes. These new residents will require space, if not garages. for car parking for themselves and room for their visitors cars, They will need room to turn these vehicles so as to avoid reversing out onto a blind bend, and provisions need to be made for delivery and public service vehicles to stop without blocking sight lines for vehicles approaching the blind bend. On top of this a new access for commercial traffic needs to be provided on to the Hasketon Road to serve the new commercial tenants, their customers and their delivery vehicles. This will surely create more traffic problems on this portion of the C309 than the existing parking at the old Forge premises.

To me it seems we are not solving a traffic problem around a hazardous blind bend ~ if the plan as proposed goes ahead we are likely to make the traffic problems worse.

I have to accept that the old Forge site is a brown field site and it would be appropriate for it to be redeveloped for housing. My concerns over access and traffic management to the residential site could and should be resolved once site plans were submitted for formal Planning assessment. So a discussion for another time in the future.

But, as I stated in my previous comments, to the last consultation I have serious concerns over the use of farm land being developed behind the Old Forge site. It is twice the size of the existing old forge footprint and if developed as suggested will severely compromise the views that these residents currently enjoy.

The Neighbourhood plan had an obligation to propose suitable sites for residential development to satisfy our new housing quota. It had no obligation to propose any site for commercial development. The hope that displaced tenants from the old Forge workshops could afford to lease any of the new purpose built facilities is aspirational and by no means assured. Whilst I am content for the old Forge site to be suggested for housing development I think the suggested situation of the commercial properties to be completely unsuitable. I believe therefore that reference to this commercial development should be removed from the Bredfield Neighbourhood Plan before it submitted for approval.

If the developer wishes to pursue a Commercial development in the vicinity of Bredfield there are other fields which they own which could be considered by following the normal planning process. It should not be being suggested as part of the Neighbourhood Plan.

I would be grateful if you would pass these further comments to the Independent Examiner before he makes his final assessments.

Environment Agency

Thank you for re-consulting us on the Bredfield Neighbourhood Plan SEA scoping opinion. We have reviewed the amended SEA report and the notes from the inspector. We can confirm that we have no further comments to make from our previous letter AE/2017/122153/03-L01 and our previous comments still remain relevant.

We trust the above is useful.

G Gamble and S Manville

As the Examiner notes in his letter to Laura Mundy (Bredfield Parish Council) on 4th May 2020, the additional information in her letter to him of 1st May 2020 was not available to us earlier.

We therefore draw attention to the Parish Council's omission in not ensuring full transparency in the planning process with regard to affected residents. Further, we would like to make the following observations:

1. As the Parish Council concede, no specific discussions have taken place with the Highways Authority in relation to access arrangements for the Forge location. Absent such expert opinion, the Neighbourhood Plan's comments on the use of Boulge Road and access to the Forge site lack authoritative substantiation and may, indeed, paint an incorrect picture.
2. The Parish Council has raised the problem of cars parking in the road and forcing other vehicles to pull out into the dangerous bend by The Forge before. Although there has never been a satisfactory solution to this problem, this proposal will not provide it.
3. The number 70 bus does not use Boulge Road without difficulty, as the Parish Council asserts. On the contrary, any traffic travelling in the opposite direction, vehicles parked on the road or delivery vehicles cause problems for the bus, causing it to wait or navigate the obstruction with difficulty. This is because the road is, as the Examiner notes, "barely wide enough for two cars to the east of the site and effectively single track to the west of it" (Examiner's letter of 4th May 2020). As residents on Boulge Road, we observe these difficulties frequently.
4. The Parish Council's comment that the bulk of any traffic to/from the site is likely to use the A12 is significantly flawed. Access to the A12 is already very difficult at the junction so traffic from the site is likely to turn left along Boulge Road, through Hasketon. The Parish Council Plan of 2006 called for traffic control measures at the A12 junction but nothing has been done to date. Given the fact that traffic from the site is likely, therefore, to go through Hasketon, there would seem to be a call for consultations with the residents of that village on likely increased traffic flow. This

additional traffic flow could be considerable, based on the estimate of additional vehicles in the following paragraph.

5. With regard to policy BDP.9's requirement that any planned development on the Forge site should "ensure the activities to be undertaken on the site will not result in significant increase in heavy vehicular traffic on the roads in the vicinity of the premises or elsewhere in and around the parish", we see no evidence that these forecasts can be guaranteed. Already, there is a not insignificant amount of traffic going through Bredfield Village, which includes HGVs bound for Debach and a twice daily school bus. It seems highly likely that the proposed development on the Forge site will further increase the amount of traffic in the vicinity. The suggested location replaces the old Forge buildings with up to 10 homes. These new residents will require space, if not garages, for car parking for themselves and room for their visitors' cars. An estimate of an additional 20 cars is not unreasonable. The new residents will need room to turn these vehicles so as to avoid reversing out onto a blind bend, and provisions need to be made for delivery and public service vehicles to stop without blocking sight lines for vehicles approaching the blind bend. On top of this a new access for commercial traffic needs to be provided on to Boulge Road to serve the new commercial tenants, their customers and their delivery vehicles. In addition, therefore, the proposed creation of at least 3 new sets of commercial premises, each with parking for 9 cars brings at least a further 27 vehicles, making a total of nearly 50 more cars in this quiet, rural location. This does not include additional traffic caused by car transporters, car recovery vehicles and delivery vans for the proposed commercial premises.
6. Although the Parish Council claims its proposed new policy solves an existing, long-standing problem, in terms of car parking for the Forge, we question the very premise of the solution on timely environmental grounds. At this moment, and particularly in the light of concerns brought to light by the coronavirus pandemic, businesses everywhere are seeking to manage their environmental impact by reducing, rather than maintaining their existing levels of parking places in favour of provision for bicycles or electric bicycles.
7. The development of the Forge site for commercial use is an amendment to the Bredfield Neighbourhood Plan. The development of commercial properties does not form part of that original plan. Plans for residential development are part of national goals to create more housing. Plans for commercial development on the site have nothing to do with this strategic objective, nor is it required for the existing

businesses to be offered new accommodation. Indeed, it is doubtful whether existing businesses would be able to afford the enhanced rents chargeable in the proposed properties. For these reasons, the proposals for commercial development of the Forge site seem opportunist at best.

8. The proposed development of the existing Forge site more than doubles its existing footprint, taking development on to existing green fields, coming right up against residents' properties and spoiling the views they currently enjoy.
9. If the proposed development of the commercial premises at the Forge site goes ahead, our property, [REDACTED], would be surrounded by the proposed premises, the associated car parking for the site and the access road to the site.

For the above reasons, we strongly oppose this proposal.

L Marriott

I notice that the Examiner has highlighted insufficient information on Policy BDP. 16 : Preserving Character.

I too have grave concerns, especially in regard to any new housing development.

It is a fact, that Council Planning only recognizes the adjacent properties when Planning Permission is sort for Housing development - but that does not mean the Environmental or Character impact is limited to affecting just those adjacent properties. It has a much more far reaching effect on a green rural, wildlife rich and sedate village such as Bredfield.

The quiet green spacious environment is what is valued most and what attracts new residents, that lack of town like housing configurations, retention of open spaces, arable fields and many well used countryside footpaths with safe roads for children to walk/cycle is their goal.

Currently the Bredfield Neighbourhood Plan is proposing 2x sites for Housing Development and 1x site for Commercial Expansion in Policy BDP.15: Sites for Development.

Site 534: Land South of Tudor Cottage

Planning Permission was previously sort to develop the land for 10 Terrace style houses and was refused, appealed and dismissed.

In all this to and fro of Planning Permissions the Bredfield Parish Council were involved - yet, they are more than happy to include this arable field for housing development so long as it does not detrimentally impact on the Grade II Listed Building `Tudor Cottage`.

Site 534: What about the properties immediately opposite that field?

In particular, `Sirocco`. There would be significant detrimental impact on all the properties opposite, because of the positioning of the new access road. Another entrance to the field would only compound the already compromised flow of traffic along that narrow stretch of road, especially due to the very close proximity of large heavy farm machinery road access (North side already opposite `Tudor Cottage`).

It should also be noted: the two nearest opposite houses having exceptionally low and large 1960's traditional period front windows, are sensibly spaced detached Chalet Bungalows

(with room view roof windows) would be overlooked by new housing. At ground level it would be unavoidable once the mature 49+ year old high wild hedge was removed (no matter how setback the houses were from the road). And the hedge would have to be totally removed to comply with both the new access road to the development and wide pavement edging to 'The Street' - both absolute requirements of S.C.C Highways.

Site 534: What about the loss of the vital non-domestic Open Space?

This arable field is the only field left along the whole length of 'The Street' - the rest of this narrow road having been built-up over the years. It is a vital buffer for the Village Hall, Shop and Playing Field areas to bring a sense of calm, wildlife, countryside and to reduce noise pollution for their visitors and residents alike. It was even muted at one stage that the Village Hall would like to expand its leisure area by the purchase of Site 534 for the benefit of Bredfield Community as a whole. Thus retaining the Village Rural status for many further generations wellbeing.

Site 534: Would a new housing development boxing in 'The Street' really be an asset to Bredfield?

The types and styles of houses thus far proposed via Planning Permissions would indicate that the Owner of this land is interested in maximizing the amount of houses for the land, with maximum monetary return/profit.

There has been no mention of Affordable Housing, one/two bedroom Starter Homes nor of any desire to layout the houses in a sympathetic Rural or spacious configuration (as seen elsewhere in the Village i.e 'Robletts' Close). This type of exclusive housing has been built in the Village over the years, mainly as 'In Fill' houses and all very much beyond the affordability of young families - which according to other sections of the Bredfield Neighbour Plan is the priority for both sustainability and long term Village stability?

Therefore I propose that a housing development would shatter the Rural ethos at 'The Street', essential to keep the countryside/wildlife/residence environment balance currently experienced, because the road is mostly lined with detached well spaced housing and to the North of the field, reflected in an almost 'conservation area' with larger sprawling properties. In deed, this useful field divide of natural habitat from residential to persevered 'conservation' like area, makes cars often turn back at the last established house point of 'Sirocco, The Street' - because they believe they have reached the end of the village and not found their destination!

Other parts of the Village have their own Rural charm and like 'The Street' each road has it's individual qualities which all contribute to make up the unique whole of Bredfield Village. Without conserving this precious eco-balance, the attraction of new residents to the Village would undoubtedly be lost and too the Village Sustainable Community.

M and D Lewis

We would like to add our concerns to those raised by Richard High.

Firstly Boulge Road is a very narrow road and does not support the use of buses or farm machinery well at all. It is narrow, winding and even light traffic causes damage to the road let alone large vehicles. I have personally passed buses and farm machinery on this road and the process is almost impossible at some points and challenging everywhere else. Buses and farm machinery use this road out of necessity and I am certain that no one operating any of those vehicles would recommend any additional traffic (particularly large vehicles) on that road.

It is possible that the bulk of any traffic to/from the site is more likely to use the A12 but we do not know which route they will take. What we do know however is that many people already choose to use Boulge road (through Hasketon) to get to the A12 particularly during busy times in order to avoid having to cross both lanes of the A12 at the main junction. Increased traffic from this development will obviously increase the number of people choosing to use this option to get to the A12.

Secondly the language used in policy BDP.9 is vague and imprecise and sets no limits on the number or size of vehicles. I think we can be confident that, given the proximity to the A12 and to Debach Warehousing and Haulage, large vehicles on the site are a certainty. As Mr High points out, even small scale development is likely to generate some heavy traffic and this will inevitably increase traffic in the vicinity of the development and in the parish.

Thirdly Scotts lane, Woodbridge road and Boulge road are very popular with walkers and cyclists, the lack of footpath already makes this stretch of road treacherous for them. Obviously any increase in traffic, particularly heavy traffic, will only increase the risks to these road users.

Finally the problem of a left turn out of Boulge road is far from being relevant only to HGV vehicles. I personally make that turn several times a week in a car and can tell you that it always means driving on the wrong side of the road into oncoming traffic on a blind bend. Add to that the heavy HGV traffic that constantly uses that road both to and from Debach Warehousing and Haulage and the stretch of road between the village pump and the proposed site will become extremely dangerous.

I will also add that the idea of an HGV attempting that left turn out of Boulge road, or a right turn into Boulge road, makes me very nervous and is almost certainly going to result in an accident. The turn is so tight that it may prove impractical for larger vehicles and those with trailers to make these turns at all.

We remain opposed to the development and would suggest that the Highways Authority should be properly involved in the highways implications of this proposal.

National Grid

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

[REDACTED]	[REDACTED]

If you require any further information in respect of this letter, then please contact us.

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

<https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here:

www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team

Block 1

Brick Kiln Street

Hinckley

LE10 0NA

0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this neighbourhood plan further consultation.

Suffolk County Council

The purpose of this response is to clarify the Highway Authority position on site BD9.

County Council Previous Responses to the Neighbourhood Plan

At the regulation 14 consultation the County Council did not raise any objections to site BD9 and considered the proposed small scale employment use of the site to be acceptable in principle.

SCC chose not to respond at the regulation 16 consultation. On reviewing the Submission Draft Plan it appeared that the County's comments at the previous consultation had been taken into account and SCC was content that there were no issues in relation to the Basic Conditions.

The Highway Authority View on BD9

SCC still has no objections in principle with the allocation of BD9. It was not envisaged that there would be significant heavy vehicle movements due to the proposed scale of the development. As there are currently no specific proposals for the site at present, detailed impacts cannot be assessed, but is expected these issues would be addressed at the development management stage. The County Council would expect any significant impacts on highway safety to be mitigated and would object if safety impacts are considered to be severe, as per paragraphs 108 and 109 of the NPPF.