

## Ipswich

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Our Ref:

25<sup>th</sup> July 2016

Dear Sirs

### **Great Bealings Neighbourhood Plan**

I have been instructed to respond on behalf of the owners of the Grundisburgh Estate, since there are a number of proposals in the Plan which directly affect the Estate and with which my clients do not agree.

At previous meetings with the Great Bealings Parish Council, I outlined the strong concern that the Plan must be a positive document designed to work in the 21<sup>st</sup> Century, as opposed to preventing change.

My overall impression of the Plan is that whilst it has excellent aims, some of the proposals are very much designed to prevent any form of change and will only have the effect of adding an additional layer of red tape and argument if and when new proposals come forward.

The rural environment is already heavily governed with statutory legislation as well as European legislation relating to conservation and habitat management and I do not believe it is for local villages to impose further restrictions on landowners detailing what they can and cannot do with their land. Landscape by its very nature is subjective and in the eye of the beholder and the reason it is so attractive at present is because it has been allowed to evolve over the centuries, taking account of changes in agriculture and the rural economy. I do not believe that it is appropriate to impose further restrictions over and above those that are already in place through statutory measures.

Additionally the introduction implies that Great Bealings itself is so special as to warrant being treated in isolation, to the exclusion of the wider county. Localism was not designed to enable Parish Councils to dictate to people, nor add layers of bureaucracy, it was designed to encourage engagement with an eyes wide open view of the world and whilst I very much support the idea of writing the Plan, I do think that as a general comment, there is rather too much dictating as opposed to consulting, in terms of dealing with specific proposals that might arise in the future.

Specific comments on the Plan are as follows.

Introduction 1.12

Acknowledgement needs to be made that designating open areas as green spaces in themselves is not necessarily of benefit to the environment and that the establishment of green spaces and green corridors will need the support of the landowners. Therefore as well as supporting communities who want to implement their plans, I would suggest that the plan needs to confirm that discussions will be held with the owners of the land in order to encourage the aim of building ecological networks across Suffolk.

Clause 3.5

I do not agree that it is the responsibility of a neighbourhood plan to create a conservation plan to protect the landscape. There are already statutory designations in place in respect of the landscape around Great Bealings and further designations are not required.

I agree that affordable housing should be subject to local consultation, however it cannot and should not be subject to the same criteria as other development. The country has a national shortage of houses and if we are to solve this crisis for future generations, each and every village needs to think responsibly and in a flexible way of how we deal with the problem. Having a policy which does not allow this problem to be treated separately is a restriction on the likelihood of success.

I think that further thought needs to be given to the proposed blanket ban on development in Flood Risk Areas. These areas evolve over time as defences improve, (or not as the case may be) and this policy will only add a further layer of bureaucracy to the existing statutory regulations imposed by the Environment Agency.

We do not agree that local heritage assets require any additional recognition and should certainly not be given additional protection. English Heritage is the statutory body charged with the protection of heritage assets and the listing process has been carefully worked out over many years in order to provide that protection. Adding additional layers of protection through local regulations will only add an additional cost burden and negate the purpose of English Heritage.

Clause 3.8

I disagree with the need for an additional designation of landscape protection areas in addition to the special landscape area already imposed by statutory regulations. I do not accept that recommendation in respect of any of the land forming part of the Grundisburgh Estate, since there are existing statutory designations which provide sufficient protection already.

Clause 3.11

Whilst accepting the designation of certain specified non-designated heritage assets in the core of the village area, I disagree with the presumption against demolition, since if growth can only occur through new areas being developed (in whatever form), you will ultimately get village spread. It therefore seems illogical to have a presumption against demolition particularly when there is no statutory regulation in place covering that issue.

Clause 4.11

As drafted the paragraph implies that because the landscape around Great Bealings is a one-off and of such a special character, there is a need to protect and where possible, enhance. Suffolk is one of many counties that have a range of landscapes in which rural villages exist in their own micro



landscapes. Whilst undoubtedly attractive, Great Bealings is one of many villages in Suffolk benefitting from those characteristics and the plan should acknowledge that whilst it seeks to protect what we, who live in Suffolk, enjoy about our particular settings, it should also be there to support evolution and to ensure that villages remain sustainable for future generations and not just for the few who happen to live in the village at the time of the Plan. The words “where possible enhance”, imply that enhancement and sustainability comes towards the end of the process, rather than at the beginning.

#### Clause 4.33

The existing tree preservation legislation is already significant and I disagree that there is any need for additional designations at local level. Veteran trees still need to be managed like any other tree and a further layer of designation will only incur additional costs, time delays and unnecessary interference. There is no need for further formal protection of trees and hedgerows in this Plan. I agree that the current landscape is attractive and that that is benefitted by the trees and hedges that are currently within the landscape, however those have evolved through landowner management and that management must be allowed to continue unhindered, taking account of existing statutory guidelines. It is not for the Plan to determine whether or not a tree can be felled or planted.

#### Clause 4.36 - Landscape protection areas and areas to be protected from development

I do not believe that the Plan should be setting further hurdles to be cleared in order to see a village evolve. Clause 4.41 sets out the intention of the Plan “to protect and enhance by making development in these areas extremely difficult to justify”. That statement in itself will lead to the village suffocating, as opposed to being able to adapt and exist in the 21<sup>st</sup> Century and beyond. The special landscape areas are already in place and there is no need for any further designations at local level.

Having looked at the Appendices in respect of the various designations, I do wonder how the village will survive in years to come given the very restrictive and anti-development proposals contained in the Plan. There is no thought to the future and the areas to be protected from development that you have chosen stifle any future considerations in that direction. The village will not survive if it does not have some growth for the future. How else are the children of the people living in the village going to be able to afford houses to live in the environment that the Plan seeks to protect?

By designating the areas along Lodge Road, Rosery Lane and the two areas either side of the road at the bottom of Boot Street as areas to be protected from development, the Plan effectively seeks to strangle any attempt to see the village expand as time and generations progress.

We formally object to the inclusion of those areas specified above and seek their removal from the Schedule identifying areas to be protected from development.

#### Clause 5.16 Policy

I am pleased that the Parish Council recognises the need to support affordable housing in the village. Rather than being specific about the number of affordable housing units, it would be preferable to be reflective of need and support the principle in accordance with national guidelines.

If the words “one or two” are used in the Plan and there is a need for three, then that presents problems for the future. Please bear in mind also that only 65% of the village responded to the survey and if 56% of those were against Affordable Housing that must mean that 44% were in



favour and a further 35% of the village had no strong objection, or they would have replied to the questionnaire.

Specifically in relation to your comments under policy BE2 where you require a clear majority of people living in the immediate area to support the Plan, I believe that affordable housing should be the subject of a village majority, as opposed to individual majorities in the immediate vicinity of the chosen site. From a community spirit perspective, the Plan should be representative of the whole village, rather than a few and I think that having a requirement specifically related to people living in the vicinity of the chosen site is divisive and not to the community's benefit.

Clause 5.20 - Non-designated Heritage Assets

The principal of buildings within the landscape and the benefits they bring is accepted. However having a general clause preventing what would appear to be a very substantial list of additional buildings befitting from any change whatsoever is restrictive and unnecessary.

Specifically we object to the inclusion of the following asset in the non-designated heritage asset schedule.

26 Hill Farm off the Grundisburgh Road

Summary

Clearly a significant and worthwhile amount of work has been put into preparing this Plan and it does contain many positive features. I do feel however that it should be more encouraging of communicating with owners of the assets to understand their needs and desires, as well as the desires of the village and it should be a dynamic document for the future, rather than a restrictive document concentrating on retaining something that evolved over time, rather than something that will evolve over time by following the Plan.

Signed

Charles Loyd  
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