

## Stradbroke Parish Council response to the BMSDC Sustainability Appraisal Scoping Report Consultation document

### Basis for response

1. Website and SA scoping report:  
*“The consultation for the Babergh and Mid Suffolk Joint Local Plan Sustainability Appraisal Scoping Report is open between 18<sup>th</sup> March and 12 noon on 24<sup>th</sup> April 2020. Please note this is NOT a consultation on the Joint Local Plan, but **on the scope of the related SA documents which are required by the Regulations.**”*
2. Stradbroke Parish Council (SPC) submitted a detailed response to the Regulation 18 Local Plan, representation which was summarised as representation i/d 17859 at Appendix A, page LUCA-9 of the SA. The SPC response questioned several matters in relation to the scope of the initial Regulation 18 appraisal in assessing the impact on human health and economic welfare of a number of policies.
3. The SASD purpose is summarised as several key points. This response takes those in order as shown in the SA document. The points are in italics and the SPC comments are beneath.
4. SPC object to certain elements of the SA and make certain general comments on it in view of COVID-19. This has highlighted the need for envisioning a new way to do things in BMSDC and the SA must step up and provide that vision in its objectives. SPC consider there is a land value differential between the two councils that cannot easily be merged with defining objectives, self-evidently MSDC is more rural and isolated than parts of Babergh and this issue needs to be taken account of.

### Document taxonomy

5. Key Point responses that require further detail have annexed documents. When those annexed documents themselves require supporting information, it is appended in Annex specific appendices.

### SA Scoping Report (Chapter 1 – page LUC I 1-8)

***The purpose of this consultation is to seek views on the proposed refined approach to the SA, in particular:***

***\* Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.” (1.5 and bullet point 1, page LUC I 2)***

6. SPC ask that two additional plans and programmes be included.
7. First, the current SCC Lorry route map and the connected process of SCC lorry route review  
The impact of the outcome of the SCC lorry route review must form part of the Local Plan SA alongside the transport route (see **Annex A**).
8. Second, the Stradbroke Neighbourhood Plan (SNP). A Neighbourhood Plan is not legally required to be included into SA considerations. However, SPC suggests that in view of the cross cutting issues raised by the transport evidence, as set out below, the SNP must be

included. This is because a Neighbourhood Plan is required to contribute towards the achievement of sustainable development. NPPF states: *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”* (NPPF 2019 para 80).

9. The SNP contains objectives to promote local business needs and wider opportunities for development. SPC consider the SA does not take full account of potential risks to sustainable development in Stradbroke. The SNP proposes to increase the population of the settlement by over 30% from base, from 1400 to 2000 people, and to alter the demography and rising age profile bias in favour of younger people and families. The SNP is a serious attempt to prevent the settlement declining into a retirement village with all of the problems that can bring. The Bailey Venning policy report shows that Stradbroke is bearing a burden far beyond its OAN for reasons connected with its made NP.
10. In view of the transport concerns raised and the cumulative impact on the SNP, SPC considers it necessary to include the SNP and lorry route issue into the SA sustainability scoping. These issues are detailed below and in **Annex A**.

***\*Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the Local Plan. (1.5 bullet point 2, page LUC I 2)***

11. SPC maintain their Regulation 18 concerns about transport and highways information. One element of the baseline information which does not provide a suitable baseline for the SA is the WSP transport study impact on the A140 corridor. It is too narrow an assessment.
12. The SA states p43:  
*“Traffic growth and road projects*

*A recent modelling report 82 tested the Council's core set of development assumptions across the District made in the Local Plan. The modelling shows future traffic growth for 2026 and 2036, as a result of changing patterns of travel behaviour and predicting future traffic impacts. The growth assumptions for the modelling consider population growth and specific development locations, as well as car ownership and relative vehicle operating costs. ....*

*5.22 In Mid Suffolk District, the A140 corridor is shown to have capacity issues at multiple locations including the A140/A1120 staggered crossroads and A140/Workhouse Road/Stoke Road junction.*

**82 WSP (2020) Ipswich Strategic Planning Area Local Plan Modelling:  
<https://www.babergh.gov.uk/assets/Strategic-Planning/Current-EvidenceBase/Transport-Modelling/2020/200115-ISPA-MR7-SCC-Hwy-ResultsReport.pdf>.”**

13. The WSP document (again p 43) pages 43-45 sets out detailed findings and a map. The findings state:  
3.11.3. **Several approach roads to the A140** between Workhouse Road and the Scole Bridge are **nearing or over capacity in the AM/PM peak in 2026/36** (Location 3 and 4 in Figure 23/Figure 24). The A140 at the Scole Bridge is nearing capacity in 2026 AM peak, and over capacity in 2036 AM Peak (**Location 5 in Figure 23/Figure 24**). For clarity and emphasis it is noted that the settlement to the right of the number 5 is Stradbroke.

14. Location 5 is the junction of the B1118 and the A 140. The B1118 runs from there into Stradbroke and down Queens Street to the village crossroads with the B1117. This crossroads of the B1117/B1118, and the B118 to the A140 through Stradbroke via Queens Street, form part of the designated SCC lorry route, for delivery and collection access only. This route is NOT a through route.
15. However, it is the convenient cut through route from the A12 at Halesworth and from Framlingham to the A143, and from the A1120 to the A143, both of which run through Stradbroke via Queen Street B1118. The A143 then feeds into the A14 at Bury St Edmunds and via Cambridge to the Midlands and North as can be seen from the regional map.
16. Since the SNP was made in January 2019, planning consent has been granted to the Cranswick chicken factory in Eye without an EIA assessment of local impact, even though it is Schedule 2 development. This is noted in the SA response to SPC comments Rep 17859 Appendix A p.A-9.
17. In addition to the chicken factory there is an anaerobic digestion site close to Stradbroke which is safeguarded in the recently examined SCC Waste and Minerals Plan. The only access to and from both sites is through Stradbroke, along B roads to the A 140 and return.
18. Eye Town council have now produced a report to show why no lorries should travel through Eye, which connects the A 140 to the B1117 through Eye and then on to Stradbroke (see **Annex A**).
19. The obvious issue here is that Stradbroke is at risk of funnelling a severe quantum of traffic within the Plan timescale which has not been modelled in the WSP document alongside the significant growth plans for the settlement.
20. SPC has already raised these issues in its Regulation 18 response. SPC has provided evidence of the significantly under modelled transport activity to and from the anaerobic digester, information obtained from a FOI request to SCC (see **Annex B**).
21. WSP has not modelled the Eye factory impact other than to show the impact on the A 140 at one specific junction, for which mitigation is proposed by way of a roundabout. However, foreseeably the factory suppliers will seek to locate broiler units as close to the factory as possible as noted by SPC in their Regulation 18 response based on the Cranswick website, in which a copy of the Cranswick website statement was provided.
22. The SPC concerns are:  
 First, that the Local Plan SA shows the transport network and **not** the Lorry route for consultation.  
 Second, it should be modelling the capacity of the SCC Lorry Route and the impact of known and foreseeable development in Stradbroke Queens Street ( ie the Eye factory and future new broiler units) on this route and taking a view on future sustainable development to inform policy. The previous SPC submission is not acknowledged in the current SA response. Both maps are shown in **Annex A**.



**Image of B 1118 lorry Route Queens Street Stradbroke, the red lorry has mounted the only pavement to allow the white lorry to pass.**

***\*Whether there are any additional key sustainability issues relevant to the plan area that should be included. (1.5 bullet point 3, page LUC I 2)***

23. As noted above one key unmodelled sustainability issue is the cumulative impact of future development on the B1117/B1118 crossroads and Queen Street in Stradbroke which may be severe. (New NPPF Para 109).

A paper written by Celina Colquhoun (Barrister at 39 Essex Chambers) in 2018<sup>1</sup> highlights relevant extracts with *emphasis added*, and references areas carried forward from the old NPPF Para 32:

*“15. .... Inspector APP/D3315/W/16/315862 commented of that test (paragraph 34) that the term ‘severe’ sets a high bar for intervention via the planning system in traffic effects arising from development, stating that: “The council agreed that mere congestion and inconvenience was not sufficient to trigger the ‘sever’ test but rather it was a question of the consequences of such congestion”. I agree with my colleague’s comments, which have influenced my determination of the appeal.*

*16. In the above mentioned appeal decision the inspector considers (paragraph 25), and I agree with him, that the queuing of vehicles is a relevant matter in looking at cumulative impact development on the local highway network.*

*17. The main parties considered that the critical elements in assessing whether the impact was severe were firstly, increase in the number of vehicles likely to be generated by the proposed development in relation to the capacity of the road to accommodate such an increase, both in terms of free-flow of traffic and highway safety. In addition, the ability for pedestrians to cross the main road conveniently and safely and the ease of vehicles to gain access to the main road from side streets and access points, were agreed to be important factors in assessing potential severity of impact.”*

24. Some of these principles are now set out in the new NPPF in Paras 108 a-c.

<sup>1</sup> <https://www.linkedin.com/pulse/transport-grounds-refusing-permission-severe-nppf-32-colquhoun/>

25. Queens Street must be specifically included as a policy consideration for all future development. In the photo above for example, the entrance to the lapsed scheme in the SNP written in because it already has planning permission and for no other reason, is obscured by the white lorry and this site for one clearly fails the above NPPF test.

***\* Whether the amended SA framework (Chapter 11) is appropriate and includes a suitable set of SA Objectives. (1.5 bullet point 4, page LUC I 2)***

26. SPC **object** to SA Objective 16 as it is not effective. It does not stress test the impact of proposed commercial development travel along the B1118 pinch point in Stradbroke. SPC also make general comment on the objectives below.
27. To make this objective sound and therefore the policies and allocations to be assessed against it sound, Objective 16 must include the question:  
**“Will it contribute to a severe impact on the SCC lorry route in BMSDC at any point?”**  
This will require the developer to model the impact by showing the distribution route for their business and the quantum in every case, and not just the impact on the local road junction as in the WSP modelling for the Eye estate.
28. Asking that question would have ensured the Cranswick factory was made accountable in a way it has not been so far, and will require developers to show the lines of travel to be taken by their lorries, which can then be conditioned in planning.
29. The evidence for the Barley Brigg digester shows that the developer’s transport assessment figures alone were unreliable. The requirements to show the route impact in visual and numerical form would allow settlements to monitor permissions effectively. (see **Annex B**)
30. This will allow for the hierarchy of “prevent mitigate compensate” to operate effectively in future determinations and be accountable to local communities affected by lorry traffic.
31. SPC make general comments that the objectives may need to be expanded and amended in view of COVID-19 to facilitate economic objectives.

In particular:

- Specific requirements to support long term home and remote working solutions.
- To envision and take account of, and also to promote, long term agri tech development solutions for crop growing over traditional farming in view of the current labour shortage for traditional crops. SPC raised this in Regulation 18 responses.
- Likewise there must be a strong lead on managing broiler developments in view of infection and contamination lessons learned by the COVID-19 outbreak. (see SCC correspondence **Annex A**).

***\*Whether the criteria and assumptions for appraising potential site allocations are appropriate for this stage of the SA process, and a suitable refinement on those used to date. (1.5 bullet point 5, page LUC I 2)***

32. SPC have commented in detail on this matter in Stradbroke with evidence. The current evidence supports avoidance of highways impact on Queen Street of allocations not specifically written into the SNP. This will impact in particular on Policy STRAD19 Grove Farm (See the full response in **Annex C**).

***\*Whether the overall spatial strategy options represent a suitable and reasonable set of alternatives, and that no other clearly distinguishable spatial strategy options should be added.***

*(1.5 bullet point 6, page LUC I 2)*

33. SPC support the spatial strategy as it relates to Stradbroke Parish. Residential development capacity is set by the primary school as noted in the SNP examination report para28 p.8: *“A fundamental constraint identified in Stradbroke was that development in excess of 270 new dwellings would be very likely to trigger a requirement for a new primary school. It was felt that a new school would be likely to require a strategic scale of growth which should be determined through the Local Plan process.”*

**Annex A:**

- SCC Lorry Route Map,
- Transport Network Map,
- SCC HGV review correspondence,
- feedback from SPC Highways Public Event and complaints,
- SPC Traffic Analysis, and
- Eye Town Council report in to HGVs.

**Annex B:** FOI information re traffic movements - anaerobic digester, Stradbroke

**Annex C:** SPC update on Sites included in SNP with relevant appendices