

# West Suffolk Council Plan Consultation July 2022

## Response from Green Ixworth

Green Ixworth supporters live in Pakenham, Bardwell, Honington/Sapiston, Troston and Ixworth. We submit the following as our response to the WSC Plan.

Our aims in this response are to:-

- Improve our Environment and Biodiversity and make a full contribution to reduce Global Heating;
- Enhance protection from unwarranted development in rural areas;
- Enrich the life experiences of residents;
- Improve the economic, social and health benefits of living in West Suffolk;
- Focus on the NE side of Bury St Edmunds.

Note: This document is prepared as a narrative in order that our supporters are not obliged to work their way through the whole of the extensive documentation and thus prevented from contributing to the outcome. Many will have read parts of the plan and our consultations have been wide. The alternative would be to provide lengthy responses to each question with background and nuances in the comment text making the whole response much lengthier and repetitive and frankly unworkable. So we hope the text conveys the messages of our support, concern and suggested alternatives.

Green Ixworth is broadly pleased with the previous plan's principles and improvements, where made, in the proposed plan.

To be more specific:

We are content with the proposals on the preferred option 1 for West Suffolk. We recognise there are good reasons for a completely new town. It could in some ways be better for the environment, improving viability of public transport and creating more concentrated and better services for residents. However we are, where we are. Locations for it would be difficult and disturb the existing human and natural environment. Many of the towns and Key/Local Service Centres would lose their ability to retain services such as transport, education, health care and retail facilities as the population aged. So we believe that, with care, the proposed geographical distribution of new development is acceptable and can provide viable and balanced communities.

Locally, i.e. the Ixworth/Stanton (NE Quadrant) area, the proposals broadly match those in neighbourhood plans.

SP2,SP5,SP8,SP01

# 1 Housing and Employment

## Employment

Employment is of concern as the only significant foreseeable opportunities are at Stanton also contributing HGVs to the A143 traffic. We welcome all new environmentally sound employment opportunities especially if they provide training and promotion opportunities and are close to the proposed housing developments. [see also under housing]

SP9, NSDP44

## Housing

As already indicated we are broadly content with the distribution of new homes in West Suffolk particularly in the NE quadrant. However we are concerned by the overall numbers demanded by government. The need to depend on large developers for larger developments means their priority is inevitably to maximise profits from their land which means more expensive and larger houses for sale. Whereas the local need for housing is for smaller and much cheaper properties for rent and for sale. We should very much welcome WSC building social housing and thus more accountably. Government has recently indicated its encouragement to LAs to directly build social housing.

During the preparation of the Neighbourhood Plan for Ixworth and Ixworth Thorpe, the Housing Needs Survey and the consultation with residents, demonstrated that the primary need for new housing in Ixworth was for **really** “affordable” housing to purchase and rent. Smaller properties for the young and the older and elderly scaling down, were the priority rather than more “executive” homes. One difficulty was the inability to secure interest from Social Housing providers for which there is undoubted demand from those on the WSC Housing register thus why we seek action from WSC.

Another option we should welcome is the establishment of Community Land Trusts involving local people in overall design, types of housing and an opportunity for local tenants. This would require WSC to enable land purchase and assist with legalities.

Dramatic price increases have now put the prospect of home purchase out of reach of many younger families. Homes for rent are therefore at a premium whether private or from social providers. The reduction of travel is crucial to reduce carbon emissions so employment opportunities should be reasonably dispersed but only possible if homes and workplaces are close to one another. This would help local communities balance their demographic, being better for all and helping to maintain balanced, efficient and friendly communities.

There is an ageing population in Ixworth and the wish to stay in the village, even to live in something smaller, should be recognised. To maximise the saleability and flexibility of property purchase and to recognise the growth of numbers of people with disabilities due to the ageing of the national population, all new properties of whatever size should have, on the ground floor, doors wide enough for a wheelchair and step free access.

Provision should be made for travel accessibility. Proper provision for the safe use of scooters and wheel chairs, prams etc. should be guaranteed. Pavements should be of a width to permit use with no encroachment from hedges or parked vehicles and dropped pavements wherever continuous routes are broken by vehicle access e.g. roadway junctions. This may require physical intervention and protection.

These factors factors of course are not confined to Ixworth.

SO7, SO9, SO11, SO12, SP2/3/4/7, IDP16, NSP03/29/30/33/40

## **Heat**

The early predictions of temperature increases due to Global Heating significantly underestimated what has already happened. In the past decade as average maximum temperatures in the South East corner of England have increased by 1 degree.

Meteorologists and climate researchers believe this rate of increase will continue beyond net zero in 2050. Hence why previous records are repeatedly being broken. Temperatures in cities/large towns can be 7 degrees above surrounding areas.

The impact of higher temperatures at night or day is to increase death rates, particularly among the elderly or those with weakened cardiac systems. It will also damage much of our natural environment. Long term exposure from one's youth is more accepting of higher temperatures but still has limits particularly in humid environments.

According to the US Institute of Environmental Health Sciences:

“Loss of internal temperature control can result in various illnesses, including heat cramps, heat exhaustion, heatstroke, and hyperthermia from extreme heat events. Temperature extremes related to heat can also worsen chronic conditions such as cardiovascular disease, respiratory disease, cerebrovascular disease, and diabetes-related conditions”.

High temperatures such as we have experienced in 2022 are not only life limiting but detrimental to the operation of Health and Social Services.

The impact on the environment is equally grave. More water evaporates, soils dry and food and other plants weaken or die, shortages may result. Responses often take the easy way out and pump water from water bodies and the aquifer, which is, at least in the short term, not replaceable. Soils become more saline. In this aspect the three counties of Cambridgeshire, Norfolk and Suffolk are at the greatest risk as they are the driest area in the UK.

A number of solutions to these problems are referred to elsewhere in appropriate sections however some are better addressed in common.

Carbon reduction is the most obvious measure to reduce temperatures in the long run. In the shorter term the following measure need to be taken to design a cooler environment:

Mediterranean countries show us the way to building in “cool”. Narrow lanes or roads which are well shaded by buildings, squares providing shifting shade over the day, water features and above all fairly dense stands of mature trees in open ground and more along edges of roadways, paths and recreational areas. The importance of retaining mature trees in developments is essential as they cannot be adequately replaced by saplings which may only mature over many decades. In many traditionally hot countries air conditioning is seen as a response but these use large and unacceptable amounts of electricity. Alternatively the use of external shutters on homes helps to reduce heat loss in winter and heat gain in summer. There is a good reason why they are universally used in continental Europe, they are a one off cost and work with little or no operating cost and yet

will need legislation in order for people to be able to retrofit them or understanding planning authorities.

The new building regulations do call for builders of new homes to “*make reasonable provision to limit over heating*” and “*provide adequate means to limit summer heating*”. While vague it does give planning authorities a degree of freedom to determine how that may be implemented. We are sure that WSC will wish to make good use of that freedom.

Buildings should be passively cooled as well as gaining energy when needed in cold weather. Techniques to achieve this have been available for many years. [See Solar Village below.] Suffolk houses have traditional features such as rendered walls which when painted white reduce internal summer temperatures. White render rather than relatively dark brickwork should therefore become the norm.

Public areas should be provided with shade trees but also water bodies with appropriate planting. The past policies of water companies et al to remove trees from water course banks are gradually changing but should be replanted quickly. Evaporation from water bodies is harmful to water supplies and biodiversity. Water bodies provide cooling for up to a 30m swathe on each side which can be further improved by trees and their shade, e.g. Blackbourn Valley.

In new developments, any planting after establishment, should be capable of surviving drought or at the very least prolonged dry periods. Until they are self sufficient their maintenance by the developer should be mandated. Appropriate wild flower mixes rather than grass are more capable of surviving without long term irrigation and themselves are better at protecting natural systems including soil and wildlife from the ravages of heat.

SP1/2/3/, DIP18, NSP3, 6, 7,15

## **Cold**

The converse of heat is less deterministic. The evidence is that Western Europe's main source of winter warmth is what is loosely known as the North Atlantic Conveyor, a warm current from the South Atlantic reaching as far as Greenland and points west. It is slowing down due to climate change and thus reducing the heat transfer to Europe. It is believed that the continuing slow down will produce colder winters. What impact there would be on winter precipitation is less clear. Apart from extra requirements for heating it could provide a challenge for many parts of our infrastructure. We could finish up with a climate similar to the East Coast of the USA with temperature extremes. Fortunately some measures to deal with heat can also protect against the cold e.g. insulation.

NSP03, 06, 07

## **Demolition**

Although the assumption is made that refurbishment is preferable to demolition and rebuild, it is too often not insisted upon, on grounds of cost or convenience. If we are to take carbon reduction seriously then the bar for demolition should be substantially raised. As an example the scheme to rebuild M&S store/offices in Marble Arch has recently been called in by the SoS to reconsider the agreement of the old Westminster Council to demolish. NSP3

## 2 Infrastructure

Housing and employment are the major development concerns of the plan with the Draft Infrastructure Plan providing much of the guidance for implementation.

Therefore a major concern is the provision of infrastructure and how this may benefit the environment and biodiversity. At present our infrastructure fails to sufficiently decarbonise which is at odds with the Environmental Policies of Government, WSC and SCC.

### Transport

The Infrastructure Delivery Plan is highly dependant on future decisions to be taken by Transport East, British Rail, East West Main Line Partnership, Suffolk County Council, National Highways, Anglian Water and the Environment Agency and no doubt others. Some aspects on which the plan depends, e.g. Haughley Junction upgrade, may not even happen. The plan has been recalled by the Dept. for Transport and is almost certainly not possible to be completed by 2024 nor in the foreseeable future. This inaction will now put much more freight on the A14 than anticipated and thus generate more carbon rather than less. It is not possible from the draft document to understand the direction in which the organisations above are heading, therefore making decisions on the appropriateness of the WSC Plan extremely difficult at this stage. How much of these plans are going to be subject to public consultation?

Transport in a rural community is a problem everywhere but especially so in Suffolk as the SCC lost its bid to government for further support for rural bus service improvement to address our highly dispersed communities. In most villages residents without a car are unable to benefit from the excellent entertainment, retail and eating facilities in Bury. The prospect of working outside the villages severely limited by the infrequent services. Even access to the Country Parks and recreation facilities are dependent on cars. We welcome the sophisticated transport structure proposed in Cambridge reaching out to western parts of West Suffolk. We should like to see the West Suffolk Plan, working in conjunction with SCC, to provide something more forward thinking for the rest of the district.

The Cambridge travel to work area now includes BSE. There is a direct rail connection from Ipswich to Cambridge, hopefully later to Oxford. The line runs through the centre of the major recent and proposed new housing developments in BSE/Great Barton. It also accesses major new developments in Thurston and Elmswell. Green Ixworth wishes to see an urgent examination of the prospects for a light rail or shuttle rail service providing a more regular and frequent service than at present, between Cambridge and Ipswich. Until the junction at Haughley is reconstructed, such a regular service might not be able to reach Stowmarket. This shuttle could significantly reduce traffic on the A143 and local roads from all the new developments in Moreton Hall and Great Barton and act as parkway station for more distant east and west travel. This would require space in the proposed new developments for a station and parking. A new station serving the eastern part of the developments could provide non-car access to BSE and points east and west.

We and a number of Parish Councils are concerned at the group of developments proposed along the A143 NE of BSE. They consist of approximately 3,000 additional homes plus the large Copart commercial development at Stanton directly using the A143. In addition there are more homes in Mid Suffolk planned along the route. We note that the St Joseph's developer has appealed the relatively minor road improvements between it

and the A14. However those improvements, even if sustained, will not be sufficient for the additional traffic generated by the above developments, a more strategic view including the Great Barton Bypass needs to be taken prior to any further development to the North East.

Ref sites: 2.02f, 3.03a, 3.03b, 3.07a, 4.01a, 4.05a, 4.07a

A number of existing policies/proposals are based on plans developed a decade or more ago, since when realisation of the impact of our carbon based economy and possible solutions have been developed. The Suffolk Growth Framework is not yet completed and from our reading of the references cannot accomplish its aims. For example changes to working patterns may reduce car travel to some degree but recent decisions by Suffolk County Council to significantly reduce expenditure on the school bus service not only deprive residents of choice of school through the threat of high fares or even no service but increase car use, thus negating the WFH advantage. The impact of the school run around BSE is most notable between 08.30 and 09.30 when schools are closed and congestion is much reduced.

Green Ixworth believe that the NE quadrant has a number of infrastructure problems which will only be exacerbated if the present development sites in the previous and proposed plans, go ahead without a strategic plan for infrastructure. Whilst this consultation is helpful the participants also need to be party to the plans of other bodies on whose plans they will be dependent. Initially it would be helpful if a working group of Parish Councils and other interested bodies, such as GI, were to be convened along with those other bodies preparing their plans to consider those dependent on the A143. Whilst the West Suffolk Planners may be doing their best within present decision making constraints there is nothing like getting early views of the reality in many of our village communities.

SO19/20, SP4, DIP4/7/9/10/11, DIP app1, NSP03/06/11/12

## **Noise**

Noise is not referred to in the Draft Infrastructure other than relating to military installations. It has been shown that excess noise causes stress, loss of sleep and mental health issues. Many existing developments suffer from Road Traffic noise, no new ones should need to. There is no level of road noise prohibited under the Noise Abatement Act and its successors although there may be from industrial premises. However there is a prohibition of building houses where the noise levels from military installations such as airfields would exceed 77db. This seems to us to be still a high but not unreasonable measure of excessive noise. Homes should therefore not be built within the 77db noise contour of roads or industrial premises unless a sufficiently effective natural planting or artificial barrier reduces sound levels all year round.

SO16

## **Water**

Water Recycling Centres, with future investment, may satisfy the Environment Agency and the new developments in urban areas. Recent evidence of Anglian Water receiving only two out of five stars from the regulator, show that the assurances received may not be worth very much. Greater emphasis should therefore be placed on alternative sources of

guidance on future events. Anglian Water however have a large number of smaller works on which Ofwat will currently not permit improvement due to the cost exceeding the perceived financial benefit (CBA). Regardless of size, the output from these WRCs needs to be diluted by fresh water in the streams receiving the discharge. As this is being written, the Black Bourn in Ixworth has not noticeably flowed for over five weeks. Most of any water or processed sewage which enters the river has gone by abstraction or evaporation by the time it reaches Ixworth. And that assumes no “storm overflows”, which are not limited to storms. *Please note that some statutory bodies (not local authorities) refer to the river with the ancient name of Black Bourn as the “Sapiston River”. We shall continue to use the historic name from which the Hundred was named.*

## **Water Resources**

West Suffolk is home to some of the rarest water environments in the world, the Chalk Streams: Lark, Linnet, Black Bourn, Little Ouse and the eastern arm of the Granta. They are all severely depleted with abstraction from the aquifer by Anglian Water and farmers who also take direct from the rivers. The catchment based approach to water management enables more specific research and proposals to be made. The 2021 Chalk Stream Restoration Strategy is an excellent example making a series of recommendations concerning the protection and enhancement of Chalk Streams. The group compiling the report are from the Environment Agency, Natural England, water companies, academia and wildlife organisations with a highly expert panel. There is a requirement to not just maintain but to restore these streams to their previous glory. A bourn is a chalk stream, a winter bourn is a bourn which only flows in winter, thus by its traditional name the Black Bourn should flow all year round in its natural state. It does not any longer.

The Black Bourn in Ixworth has insufficient river insect life in it to warrant having a regular recording station by the Environment Agency.

West Suffolk is one of the driest counties in England at less than 75% of the English average

Option 5.30 The National Policy Parameters require that “new developments should be water efficient – limiting water consumption to no more than 80 litres per person per day, and using efficient water fittings and water capture and re-use systems such as grey water is” **only** “*encouraged*” on all types of development is included. We are disappointed that this is not being **required**. How will the Policy Parameters on water efficiency be enforced? Shall we have mandatory water meters at last?

Rain water should no longer be evacuated in the sewage system, in spite of it reducing water company costs by diluting the output of the WRC, as it bypasses the aquifer.

SuDS are a good way of dealing with run off and rain water. However there are unexplored opportunities for using them to increase biodiversity by allowing them to retain a minimum level of water to enable wetland plants and creatures to flourish. They can have bends and hidden corners with edge planting where wildlife can flourish. Opportunities for wildlife and biodiversity should not be limited by now traditional design criteria.

We believe that the now century old idea of the Great Contour Canal should be reconsidered to transfer fresh water from the North and West to the South East where rainfall is low and demand is high.

SO16, DIP4/12, NSP16/19/21

### **Nutrient Neutrality**

In many parts of Southern England; Solent, Hampshire, Dorset and Herefordshire there are currently restrictions on new development as they are not nutrient neutral. This requirement may also impact on development of nutrient rich “farming” developments. We believe that our chalk streams and importantly the aquifer may already be beyond their capacity for accepting more nutrients.

In most cases, water for domestic purposes is derived upstream of development and waste is often returned far downstream. More cleaned used water therefore needs to be returned to the aquifer upstream of its source.

We do not believe that development is acceptable without better assurances on Water Supply; Nutrient deposition; Sedimentation; in our rivers at present. The building of the two Anglian Water reservoirs may reduce the negative impacts of supply and permit reductions in abstraction for drinking water but at this stage we do not believe that will improve the nutrient problem without major efforts at WRCs.

Agriculture is a major contributor of nutrient in rivers. Whilst there may be only limited potential for the plan to consider farm animals in the field, we believe that confined animals are a major problem with waste being concentrated and then spread on fields often at a time to suite the hard pressed farmer rather than the best for plants which would reduce run off. The use of sewage sludge on local fields is a similar problem and efforts should be made to reduce the toxins in the sludge prior to use as well as the run off nutrients. Such farm developments should not be looked at on their own in isolation from the rest of the community but by adding them to other sources of pollution nearby. The Norfolk County Neutral Nutrient trials involving Suffolk should enable more definitive action in this plan.

A number of these problems faced by the proposed plan are able to be corrected by WSC. However that entails restricting development until other bodies act to make development acceptable.

SO4, DIP4, NSP06/14/16/19/21

### **iii Flood Risk**

With the prospect of both more drought and flooding, building on flood plains other than for recreation should be prohibited. WSC should resist pressures from Government to do so when future housing targets are set. Flooding should be seen as a benefit to biodiversity and water supply planning and not regarded as a threat.

SO2, DIP4/12, NSP06/20

### **iv Highways.**

Some of the problems of the A143 have already been addressed but it and other roads produce run off into rivers and streams. This concerns us because large amounts of toxic



plastics, salt and other pm2.5s are deposited on the roads by vehicles from tyres and brakes. It is estimated that the US and UK produce 300,000 tonnes a year of these products which are then often washed into the river via drains or directly without catch pits.

Most new roads have SuDS but smaller and older roads do not. Ixworth has four metalled roads crossing the Black Bourn and discharging directly. One of these is at the bottom of the steep High Street so picks up general rubbish, pavement sweepings and toxins etc. and deposits them in a large sludge heap in the river next to the bridge. Increased sedimentation and toxicity to wild life is the result. More traffic will exacerbate this situation unless means are installed to clean or divert the run off. When they or other means of intercepting pollutants are installed and because of the extra flash flooding anticipated, we should need more frequent surface water drain cleaning than the annual mandatory minimum currently in place. NSP06

## Energy

Demand for electricity will at least double with decarbonisation due to use of Heat Pumps, Air Conditioning and e Vehicles, etc. Some of this increased demand on the grid and overhead lines can be reduced by better home insulation and generation. Solar Hot Water panels would also reduce energy usage. There is currently no justification for any new building not to have Photo Voltaic Panels and Battery Storage installed along with a Heat Pump and Solar Panels. Where developments are beyond a few houses, communal ground sourced heat pumps are desirable with capacity to service nearby existing properties. A ground source heat pump providing a network for the new development with a surplus for distribution to neighbouring properties paying a fee for heat thus saves the high capital cost for existing homes. Note: Battersea Power station was built in the 1930's providing district heating in Chelsea to use their otherwise waste hot water and recently Burwell near Newmarket established a communal GSHP scheme.

## Solar Village

In the early eighty's, design started on a new Village just north of Athens. It was in two parts, one small, using solely passive heating, cooling and electricity, the other using active technological means plus passive methods. Occupied in 1988 the technology was by modern standards underdeveloped but there were some remarkable results. Energy storage for winter was a large underground tank of water, by October heated to 98 degrees from solar collectors. The only external energy input was diesel for a generator whose waste heat also heated the water. Clearly climatic differences with Suffolk were then significant but today perhaps less so, their problem was also more often cooling in the summer.

40 years after their design, where does the UK stand on utilising all of these techniques? We do not even need to use diesel as we have green electricity and storage available. There are local examples of similar schemes for example in new Norwich Council housing.

These collective system should inspire us to look forward to new developments following similar principles.

Overall description of the village:

<https://www.proquest.com/openview/d6c2824482fc937f1e43d1e11eba41fa/1?pq->

[origsite=gscholar&cbl=2026366&diss=y](https://steemit.com/science/@lordneroo/solar-village-in-attica-greece) or  
<https://steemit.com/science/@lordneroo/solar-village-in-attica-greece>:

Detailed review of the performance of passive heating and cooling properties only:  
<https://discovery.ucl.ac.uk/id/eprint/2641/1/2641.pdf>

For environmental reasons above all, overhead cables should not be closer than 100m to domestic property. Such cables require UKPN to keep the trees short, thus limiting the vegetation which can be grown nearby for cooling/shading nearby houses

In addition to off-street parking, EV charging points should be available at on-street parking places dedicated for the purpose.

WSC current policy on energy should be updated as it still includes communal purchase of heating oil to reduce costs rather than provision of sustainable solutions.

SP2, DIP4/13, DIP app 1, NSP02/03/07

## **NHS**

Ixworth surgery is already oversubscribed and has to deal with an ageing population and three care homes. Enlargement on the present constrained site is not realistic so an alternative solution needs to be found.

SO18, DIP4/14

## **Dentists.**

The situation with NHS dentistry in Suffolk is amongst the worst in the country. It is unreasonable to assume that people with limited resources can afford private treatment. Therefore development without further NHS Dentist resources is not viable.

SO18,DIP4/14

## **Education**

School provision in West Suffolk is generally well served. The proposal for a new primary school in Ixworth is welcome. However at secondary school level the SET catchment only offers provision for 11 to 16 year old pupils, so if pupils in the wider catchment wish to attend Thurston Community College, which offers education from 11 to 18 they require transport which is not only limited but at an exorbitant cost. As previously raised the removal of school bus services and high charges limit the choice of secondary school. As SET is currently fully subscribed in its first year, SCC needs to improve school transport to permit further development in the catchment.

SP4,DIP4/15

## **Biodiversity and access to Open Space.**

Para 18. 3-6 are very welcome, we look forward to working with WSC to help implement them. West Suffolk is, in principle, well served with parks and similar facilities. However

there are localities from which, without a car, they are not easily accessible. Generally access to natural environments from many villages is difficult as all such environments in the vicinity are exclusively under private ownership.

Ixworth is such an example, a bare field in the middle of the village with some children's play facilities but that is all. There are plans to change this but three years on still no proposals in sight as it may be dependent on the development of site 3.03a. which offers the prospect of more footpaths out with the core of the village, footpaths, of which the village is currently desperately short, and a new village hall.

In 2009 St Edmundsbury published its Green Infrastructure Strategy including the Black Bourn Valley Corridor. It is difficult to ascertain what benefit this has had on residents. Apart from the SWT Black Bourn Valley Reserve as far as we can ascertain none of the river in West Suffolk has public access. Suffolk Wildlife Trust, Green Ixworth and one farmer seem to be the only organisations which have improved biodiversity in the valley. In Ixworth access to the river is denied to the residents. Some appropriate and suitable river banks in particular require opening up so that children as well as adults may benefit from the enormous potential educational and recreational opportunities they present. We shall be better able to comment on this area when we have seen the new policy and how it will be implemented. At present 97% of English rivers have no public access. Green Ixworth would welcome an opportunity to work with WSC and SWT to jointly develop a plan for the Black Bourn Valley Corridor both to protect and improve the natural habitats and provide appropriate access for residents.

The river receives most of its water from the Norton main channel supported at Pakenham by the Thurston and Stowlangtoft streams. Thurston crosses Pakenham Fen which is to be modified by EDF as part of the Sizewell project to compensate for environmental losses at the site. It is not clear what impact this will have on Pakenham Watermill or Micklemere nature Reserve but WS and SCC should be paying close attention for the future of the Corridor.

We are not convinced that the "Suitable Alternative Green Spaces", which for Ixworth requires 20 ha, is achievable without ensuring public access to otherwise private land, the land use which often paid for from public money. Green Ixworth would welcome an opportunity to work with WSC and land owners to open currently inaccessible but appropriate natural land to the public.

One important recreational route from Ixworth village to countryside, Crown Lane, was blocked when the A143/A1088 by pass was completed in 1986. The "new" road is three lanes and fast, the route across it depending on steps on both embankments. Since then, there have been various promises by SCC to install a footbridge and the Parish Council has pushed very hard for this over many years. The response from SCC has been to insist that nothing could happen until an appropriate charge could be made against the potential developer for the site on which the bridge would land. However since those early days much has changed, not least the establishment of Biodiversity policies by WSC and SCC which promote expanding biodiversity and the green connectivity which that requires.

Green Ixworth has created a green corridor from the A143 into Ixworth partly through engagement with the developer, Persimmon, have now proposed retaining all of the tree and bramble hedges/barriers in their proposed master plan around the perimeter, thus securing peripheral corridors. This has all been supported by the parallel work of WSC. On the country side of the road the farmer has recently planted a 10 acre wood of native

species and is wilding other aspects of his operations. We shall therefore benefit from good human connectivity with the country (E) side if the bridge is built but not for wildlife. We have therefore proposed that the bridge be a dual purpose green bridge providing a link. The third side is the river. Such proposals have in recent years been backed by National Highways and Natural England and may help to reduce the annual cull of wildlife along the A143 which often resembles a battle ground of roadside carcasses, a health hazard as well as a waste of life. Such connections are vital for biodiversity to flourish, which is also Government policy. The village is otherwise closed to wildlife due to two of the three sides of the village being fast main roads with no easy crossing points.

SO17,SP2/3/4/9/15, DIP4/7/18, NSP 03/05/07/11/12/15/19/40/48.

### **New developments and Biodiversity.**

Biodiversity can be readily misunderstood and is often limited to just "more wild plants". It is essential that in order to maximise biodiversity as much of potential development land is preserved. Undisturbed soil and old trees are of immense value and cannot be replicated by planting new. It takes many decades for soils to mature after disturbance and to establish the whole gamut of fauna, funga and flora plus a mature soil structure. We therefore support 18.7/8 and expect it to be interpreted in its widest application, as above. The carbon stored in new trees will take many decades before matching the capacity of old trees. The Head of the Environment Agency has recently made very clear that improvement of biodiversity is inextricably linked to reducing the impact of Climate Change and health improvements. If biodiversity does not significantly improve then little in the rest of the plan will be relevant as we shall struggle from one crisis to another. Biodiversity should be seen as the primary goal of the Plan not just a component or an optional add on. Development and all the infrastructure issues should be only undertaken on condition they will enable enhancement of Biodiversity.

National, Suffolk and WSC policies on the protection and expansion of biodiversity are designed to ensure that firstly no harm is done and secondly that there is a significant addition to existing environments for the benefit of climate mitigation, nature, pollution reduction, exercise and mental ill health reduction. It also provides opportunities for education and appreciation of the world in which we live. We have already referred to the need to preserve existing soils and trees but cannot emphasise enough how significant is the difference between old and new. In the rare case where there is no option to removing trees and/or disturbing soil then the alternative should be something self sustaining in the longer run. We would therefore propose the development of local guidance for "micro forests" to be widely planted. These are quicker to produce good deep soils and provide dense foliage to benefit a wide range of wildlife. This method of afforestation allows native trees to be densely planted at between 3-4 per m<sup>2</sup>, and, with the correct ground preparation, grow up to 10 times faster per annum than a conventionally grown tree, with a 97% success rate. The larger the area the more the benefits, but even a tennis court size of mini forest can work its magic! They are also very suitable for clothing larger roundabouts.

For new developments the RSPB and the NHBC Foundation have produced a detailed but flexible approach to new build and biodiversity which might be adopted as it is, as good practice, to avoid having to reinvent the wheel and knowing that a major player in the housebuilding industry is already using it.

[S067-NF89-Biodiversity-in-new-housing-developments\\_FINAL.pdf](#)

SO13/14/15, SP2/4/13/14/15, DIP4/18, NSP03/05/15/19/140

### **Conclusion**

We recognise the huge amount of detailed and valuable work undertaken in the preparation of this draft plan and the forward thinking of those responsible. We regret that National Policies often seek to limit local initiatives which WSC might wish to take. However we believe that by the time this plan is agreed and implemented many of those limitations will, of necessity, have been removed. So for Green Ixworth and many others, the secure future of our diverse communities is uppermost and goes beyond current limitations of national outdated policies.