

BABERGH DEVELOPMENT FRAMEWORK

CORE STRATEGY (2011-2031) SUBMISSION DRAFT AND MAIN MODIFICATIONS (JULY 2012)

WRITTEN STATEMENT ON BEHALF OF MR PAUL PRICE

Matter 9a - Identified sites – general

Questions:

1. Are the proposals for growth appropriate and justified in relation to national policy, in terms of environmental, economic and social impact, and the evidence base?

1.1 We submit that the proposals for growth are not appropriate or justified in relation to national policy, in terms of environmental, economic and social impact, and the evidence base. In particular, we submit that the proposals for growth have been constrained by a capacity led approach and undue reliance on RS without a positive approach based on a strategy which seeks to meet objectively assessed development and infrastructure requirements consistent with achieving sustainable development. In particular, the evidence base is weak and inadequate levels of growth are proposed without special justification.

2. Is the development of the identified sites likely to be deliverable, bearing in mind any associated infrastructure requirements? Have the site constraints been clearly identified, along with mechanisms to overcome them?

2.1 We have seen no clear evidence that the site constraints have been identified, together with mechanisms to overcome these.

3. In relation to those sites previously identified in the 2006 Core Strategy, what has changed to suggest that development of the site will now go ahead, and does recent evidence indicate that these sites should be included in the new Core Strategy?

3.1 We are aware of significant work in master planning the Chilton Woods Sudbury site. However, to the best of our knowledge the site has yet to be granted planning permission.

3.2 The site at Lady Lane Hadleigh has recently been commenced following completion of the A1071 roundabout. At this point in time approximately 70 units are in course of erection including affordable homes.

4. Does the evidence base clearly identify the viability of the identified sites?

4.1 Judging viability is addressed in a preliminary way in Technical Background Paper 4 **D42** at paragraph 2.5 which draws attention to a Joint Affordable Housing Sites Viability Study 2008–09, together with Technical Background Paper 7 **D46** at paragraphs 4.6 and 4.7. We are unaware of any recent site specific viability testing.

5. What would be the implications for the overall strategy of non-delivery of one or more of the identified sites?

- 5.1 We would submit that non-delivery of one or more of the identified sites would have significant social impact and would be likely to force the Council to accept other unidentified sites with associated difficulties for infrastructure providers who rely on a reliable, effective and sound Core Strategy for planning their own infrastructure provision to meet allocated site needs.
- 5.2 We submit that non-delivery of one or more of the identified sites would be likely to force the Council into an early review of the Core Strategy.

Matter 9b : Brantham regeneration area

Main issue: Is the Core Strategy clear about what will be delivered, when it will be delivered, and does it provide appropriate mechanisms for delivery?

Questions:

1. General issues identified at Matter 9a above.

- 1.1 See above.

2. The site was identified in the 2006 Local Plan as a Special Policy Area, which was to have been the subject of a feasibility study and a development brief. With this background, does the current evidence base indicate that development is viable and likely to take place and thereby justify inclusion in the Core Strategy?

- 2.1 We have examined the current evidence base for the Brantham Industrial Estate **J01-J10** and note that these date from August 2008 to March 2012. However, these documents do not include a formal feasibility study or a development brief.

- 2.2 The Brantham Industrial Area Planning Position Statement (August 2008) **J01** at paragraph 8.1 sets out the validation requirements. Whilst some of these documents have subsequently entered the public domain, we note the absence of:

- Development Brief/Comprehensive Masterplan
- Design & Access Statement
- Green Travel Plan
- Supporting Planning Statement
- Financial justification for approach taken (Viability Study)
- Section 106 proposals
- EIA Assessment
- Archaeological and Heritage Impact Statement
- Noise and Air Quality Assessments
- Contamination Report and Mitigating Works

- 2.3 In the absence of these vital elements in the evidence base, we submit that there is no justification for inclusion in the Core Strategy.

3. Is there a clear indication in the Core Strategy of the various constraints affecting the site, including nature conservation and landscape designations, flooding issues and the need for decontamination, can be addressed?

3.1 CS paragraph 2.8.4 sets out a summary of the various constraints. However, this fails to give any clear indication of the extent to which the site is constrained.

4. Given the acknowledged importance of the site, the constraints on development, and the fact that the Core Strategy provides for a review of the allocation in five years, is the plan sufficiently flexible to respond if this site is not progressed?

4.1 No, we submit that the Core Strategy is insufficiently flexible to respond if this site is not progressed. We consider that all the evidence suggests that the Council are relying heavily upon the site coming forward to contribute to both employment and housing requirements. We submit that there is further evidence to suggest that as many as 600 new dwellings may be required in order to make the site viable. There is also evidence that much of this is unlikely to be located on previously developed land but rather on undeveloped greenfield land above Flood Zones 2 and 3.

5. Conclusion

- *What particular part of the CS is said to be unsound?*

5.1 We respectfully submit that New Policy CS6a Brantham Regeneration Area is unsound.

- *Which soundness tests does it fail and why?*

5.2 We submit that Policy CS6a fails the following tests:

- **Justified** – as the evidence base is incomplete and alternative strategies have not been considered;
- **Effective** – as there is no clear evidence that the policy will be developed during the plan period and there are doubts whether this policy is based on effective joint working on cross-boundary strategic issues, especially in the light of representations from Suffolk County Council and Tendring District Council.

- *How could the document be made sound?*

5.3 By omitting Policy CS6a and relying on explanatory text at paragraph 2.8.4 together with Local Plan 'saved' Policy EM06, as a basis to enable a more mature proposal to emerge and to be tested through a Core Strategy Review in five years' time.

- *What is the precise change/wording sought?*

7.4 **Policy CS1 : Settlement Pattern Policy**

We seek the following changes:

- (i) Add to paragraph 2.8.4:
The Council and other stakeholders will continue to evaluate alternatives with a view to reaching a clear preferred strategy for the site, which will be advanced at the forthcoming Core Strategy Review in 2017/8.
- (ii) Delete Policy CS6a entirely.

J R Shephard
February 2013