

## **EXAMINATION OF BABERGH & MID SUFFOLK JOINT LOCAL PLAN**

### **MAIN MATTER 1 STATEMENT (POLICIES SP01 & SP02)**

**ON BEHALF OF ENDURANCE ESTATES STRATEGIC LAND LTD**

**WORD COUNT: 602**



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**Does the Sustainability Appraisal (SA) provide a comprehensive and robust basis to inform the strategy and contents of the plan, particularly in terms of:**

**(b) its consideration of reasonable alternatives, including the nine spatial strategy options?**

1.1 Our response in summary:

- The SHELAA Assessment of Land east of Eastern Way, Elmswell, is significantly flawed;
- The SA is flawed in its reliance on the flawed SHELAA;
- The deliverability of the infrastructure to support the Primary School at Woolpit and sustainably connect it to Elmswell is not certain;
- Land east of Eastern Way, Elmswell, has not, at the very least, been assessed as a Reasonable Alternative site within the SA; and
- Land east of Eastern Way, Elmswell, presents a more sustainable solution to Primary School provision, reducing car trips, improving health and wellbeing and active pedestrian and cycle travel.

1.2 The Planning Practice Guidance sets out that a Sustainability Appraisal (SA) supporting a Local Plan needs to consider and compare all reasonable alternatives (Paragraph: 018 Reference ID: 11-018-20140306).

1.3 The SA (Doc Ref A03) supporting the JLP assesses potential residential developments sites against the broader SA objectives. The SA states that assessed sites: include committed sites which have planning consent, allocated sites and reasonable alternatives. Reasonable alternative sites are defined as *"sites that do not have planning consent, and which BMSDC has decided not to allocate in the JLP taking into account the findings of the SA and other evidence"*.

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- 1.4 The identification and inclusion of 'reasonable sites' in the SA is based upon the conclusions of the Councils SHELAA (2020). As set out in our Statement on Matter 4, in respect of site identification in Elmswell, the SHELAA process is significantly flawed. Endurance Estates Strategic Land (EESL) are promoting the site at 'Land East of Eastern Way', Elmswell. The SHEELA's conclusions regarding this site are extremely limited, inaccurate and do not draw upon the technical evidence submitted by EESL. The SHELAA also fails to take into account the site's potential to deliver land for a new primary school in the village. As set out in our Statement on Matter 8, the JLP's solution to increasing primary education capacity in Elmswell is to deliver a new school in neighbouring Woolpit. As of yet there is no evidence in the Infrastructure Delivery Plan (IDP) which demonstrates that the proposed new highway infrastructure, specifically a pedestrian/ cycle link, to sustainably link Elmswell to the new school in Woolpit is deliverable or viable.
- 1.5 Given the merits of the 'Land East of Eastern Way' and its potential to secure land to increase primary education capacity in the village it should at the very least have been included in the SA as a reasonable alternative and assessed against the SA objectives. It is evident from our previous submissions that the 'Land East of Eastern Way' is, as a minimum, a reasonable alternative. EESL contend it should be an allocated site.
- 1.6 In respect of Elmswell, the SA's approach to considering reasonable alternative sites is flawed due to the reliance on the supporting (and itself flawed) SHEELA.
- 1.7 A Site Promotion Document detailing the sustainability credentials and indicative proposals at Land East of Eastern Way is appended to our Matter 4 Statement.