

To the Local Plan Inspectors  
(FAO: Programme Officer, Annette Feeney)  
Babergh and Mid Suffolk District Councils

Ref: 310/THO

Date: 1<sup>st</sup> October 2021

Via email to:

[Annette.Feeney@babermidsuffolk.gov.uk](mailto:Annette.Feeney@babermidsuffolk.gov.uk)

Dear Sir/Madam

**Babergh Mid Suffolk Local Plan Examination – Matter 4**

We write with comments on behalf of our clients Thorcross Builders Ltd (who are promoting a residential land allocation at Holbrook) in respect of the council's recent additional evidence for Matter 4 and the Spatial Distribution Strategy. Please accept the following further representations, which are additional to those already provided, most substantially in our Representations Statement dated December 2020.

**Shotley Street**

With reference to the council's justification for a 50 unit housing allocation at Shotley Street, document H31, Page 13, states under 'Infrastructure Considerations' that,

*"Existing educational capacity can accommodate additional provision within catchment area"*

and under 'Planning Rationale' that,

*"Growth can be accommodated within infrastructure capacity"*

These statements are in direct contradiction to the Local Plan Submission which states:

*"An extension to Shotley CP School will be required to facilitate growth in the Shotley catchment area and planned commitments."*

It seems likely that the Local Plan allocation was made to facilitate growth of the school (it may be that the landowner is the county council ie education authority) but now the council is effectively saying this is not the case and the school has sufficient capacity. This adds to our belief that the Plan is not soundly based in the first place in respect of its Spatial Distribution Strategy, noting our Representations about Shotley Street and indeed that it has been incorrectly scored as a 'Core Village'.

## Holbrook

By contrast with Shotley Street, Holbrook easily scores as a Core Village, being the ‘mother settlement’ on the Shotley Peninsula (where Shotley Street is also located, although much deeper in to the peninsula).

Our client’s promoted land at Holbrook is provided with a relatively meaningless ‘allocation’ of 7 dwellings (it already has outline consent for the same) but this is part of a larger area(s) of land where greater numbers of housing have been promoted for allocation and pursued through the Local Plan, as per our Representations. It is the *only* site in this Core Village to be allocated for housing.

Document H31, Page 12 provides the council’s view why no more than 7 units are being allocated to Holbrook, stating,

*“No further SHELAA sites. Settlement has had growth over last 20 years. Not on a transport corridor”*

The council state that there are ‘no further SHELAA sites’. However, we repeat the concerns set out in our Representations that there is a lack of evidence in the council’s assessments to indicate that the LPA has analysed either at all or robustly the whole of the Promoted Land.

The only reason given initially by the council to restricting the Local Plan allocation to 7 dwellings was to avoid a “disproportionate” addition to the village but there is no evidence that this would occur. Document H31 states that ‘the Settlement has had growth over the last 20 years’ but this is not a sound planning reason to prevent further growth of this Core Village. Indeed other settlements which have also had growth in the last 20 years are set for significant expansion eg the nearby settlement of Capel St Mary. The ‘Infrastructure Considerations’ stated for in H31 for the massive growth of Capel St Mary is,

*“Close proximity to the A12 and mainline rail services are accessible via Manningtree and Ipswich Railway Stations.”*

Our Representations have expressed concern regarding the council’s settlement strategy being partly based on an arbitrary (mainly road/A12) corridor. The ability to access railway stations (via public transport) is important however and Holbrook fares well in this regard and can be contrasted favourably to Capel St Mary, as we have evidenced.

There are no overriding constraints to a making a suitable residential allocation of the Promoted Land at Holbrook and it is well placed in location and sustainable transport terms. We ask the inspectors to look at the massive disparities of housing distribution within the Babergh Settlement Strategy, which neither meets the Local Plan’s stated objectives or national policy. Full details and analysis is set out in our Representations.

Yours faithfully,



**Chris Loon** BSc (Hons), Dip TP, MRTPI  
Director