

EXAMINATION OF BABERGH & MID SUFFOLK JOINT LOCAL PLAN

MAIN MATTER 8 STATEMENT (POLICY LP33)

ON BEHALF OF ENDURANCE ESTATES STRATEGIC LAND LTD

WORD COUNT: 2,155



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN **ENVIRONMENT** **PLANNING** **ECONOMICS** **HERITAGE**

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

8.5 a) Does the Infrastructure Delivery Plan (Doc ER01) provide the robust evidence necessary to justify policy LP33?	2
--	----------

8.5 a) Does the Infrastructure Delivery Plan (Doc ER01) provide the robust evidence necessary to justify policy LP33?

1.1 Our main points in summary:

- The Infrastructure Delivery Plan (IDP) fails to establish a sustainable strategy to deliver new primary education infrastructure in Elmswell. The proposed strategy to deliver a new primary school in neighbouring Woolpit, to support demand arising from new housing allocations in Elmswell, will result in increased journeys by the private car and reduce social cohesion and integration in Elmswell.
- The IDP confirms that there is an unknown and significant funding gap to deliver a new pedestrian/cycle link to the proposed new primary school in Woolpit. The IDP confirms that this link is 'essential' infrastructure.
- The specification, siting, route and design of the new pedestrian/cycle link is not evidenced in the IDP.
- The IDP does not demonstrate that SCC has the land under control to deliver the new pedestrian/cycle link.
- The IDP demonstrates that the pedestrian/cycle link is not deliverable and not viable, accordingly, the strategy to address rising primary education demands in Elmswell, at a new school in Woolpit, is not justified or effective.
- Land East of Eastern Way, Elmswell, can provide sufficient land for the delivery of a new Primary School easily accessible by sustainable modes (particularly pedestrian and cycle) from the majority of Elmswell.

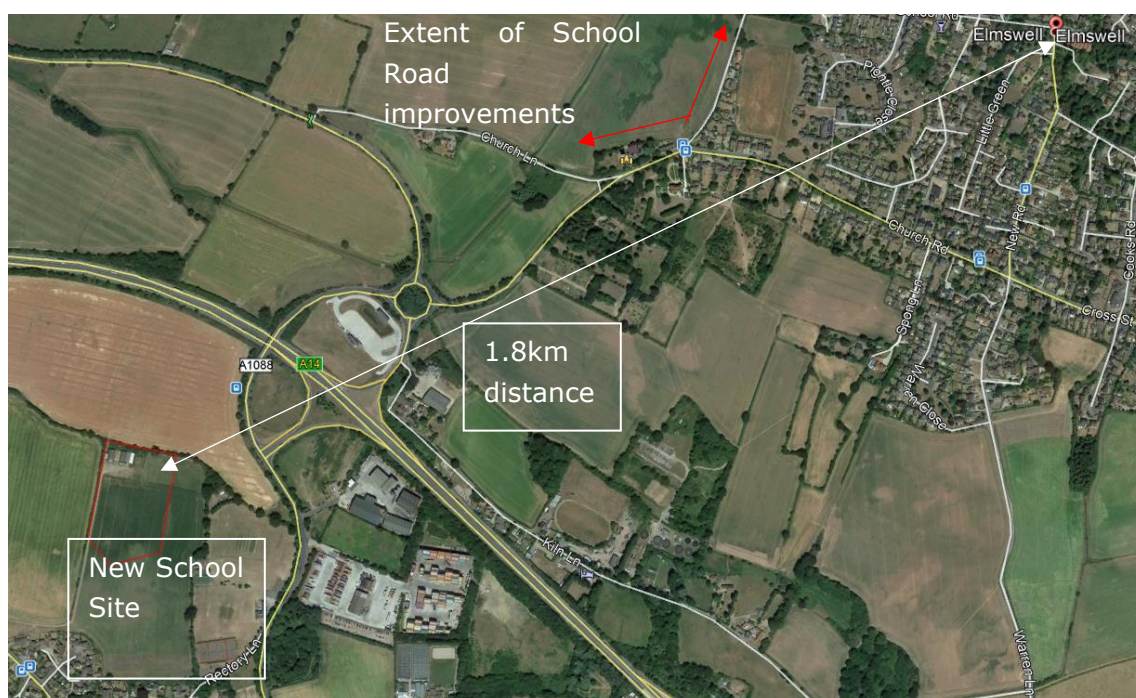
1.2 Paragraph 8 of the National Planning Policy Framework (2019) provides three overarching objectives (economic, social and environmental) that need to be pursued in order to deliver sustainable development. The economic objective references the need to identify and co-ordinate infrastructure. The social objective

references the need to support strong and vibrant communities, with accessible services that reflect the current and futures needs and support social well-being. The environmental objective promotes mitigating and adapting to climate change and moving to a low carbon economy.

- 1.3 Policy LP33 makes it clear that the latest version of the IDP and consultee responses will be key considerations in the determination of planning applications. Endurance Estates Strategic Land (EESL) agree that all new development must be supported by accessible local infrastructure as stated in Paragraph 1 of Policy LP33. EESL particularly endorses the need for residents to have 'good access' to infrastructure given its importance in achieving high living standards, social integration, reducing the need to travel by the private car and mitigating climate change.
- 1.4 Paragraph 1.1.2 of the IDP (DOC ER 01) confirms that without appropriate infrastructure growth promoted in the JLP would be regarded as unsustainable. Paragraph 1.1.3 states that the IDP provides specifics on items of infrastructure, when they are to be provided, by which provider and how they will be funded. EESL endorses the broad aims and purpose of the IDP.
- 1.5 Notwithstanding EESL's broad support for Policy LP33 and the IDP, in the specific case of Elmswell our client has significant concerns regarding Policy LP33 and the IDP's ability to deliver the required education infrastructure to support housing growth in the village.
- 1.6 Table 6 of the IDP confirms that the capacity of Elmswell CP School will be increased from 315 to 420 pupils. Table 6 specifically identifies that the growth from four of the five proposed residential allocations at Elmswell (Sites: LA062, 63, 64 and 66) will be accommodated by this expansion scheme. Paragraph 3.5.10 of the IDP states that the increase in capacity at Elmswell CP from 315 pupils to 420 pupils is the maximum the school can expand at its current site.
- 1.7 Table 8 of the IDP identifies that the primary education needs arising from remaining Elmswell allocation, LA065, will be accommodated at a new primary school in Woolpit. To facilitate a safe and sustainable access to the new school, from Elmswell, the IDP includes a proposed pedestrian/cycle link over the A14. The

A14 pedestrian/cycle link (Ref: IDP096) is identified as being 'essential' infrastructure in the IDP. The project has an estimated cost of £740,000, with one developer contribution of £220,000 secured to assist in its delivery. The potential funding gap identified in IDP summary table (page 185) is 'unknown' with potential funding sources listed as 'Local Travel Plans, DfT and SCC. There is no further evidence offered regarding this matter in the Statement of Common Ground between Babergh and Mid Suffolk District Councils and Suffolk County Council (DOC ES17). Figure 1 shows the location of the potential new school at Woolpit, in the context of the A14 and the edge of Elmswell.

Figure 1



- 1.8 In June 2020, SCC responded to an outline planning application for 50 dwellings at Land off School Road, Elmswell (Ref:18/02146). This site is proposed for allocation in the JLP (LA065). In responding to the application SCC reiterated that the primary education needs could not be accommodated at Elmswell Primary School and that the solution was to channel developer contributions towards securing the delivery of a new school in Woolpit. In respect of the A14 pedestrian/cycle link to the new school, the consultation response states, "A new cycleway/footway is proposed to

provide a safe route to the school and this development is delivering a stretch along School Road.” This planning application, if approved, will provide a new pedestrian/cycle link along School Road and to the rear of St John’s Church, or land for such a link (see red route shown on Figure 1). The application does not provide a direct link over the A14 to the new Woolpit school site. There is no additional information within this planning application or in the SCC consultation response as to how a direct pedestrian/cycle link to the new school will be sited, designed, delivered or funded.

- 1.9 In September 2019, Suffolk County Council (SCC) responded to an outline planning application for 65 dwellings at Land to the west of the former Bacon Factory, Elmswell (Ref: DC/19/03924). This site is not proposed for allocation in the Joint Local Plan (JLP). In responding to the application on education matters SCC stated that,

“The earlier strategy at the primary school level responding to previous applications for planning permission is to expand the existing Elmswell Community Primary School by 105 places from its existing capacity of 315- places to 420-places. However, this expansion project will not be able to deal with pupils arising from this proposed development. The draft strategy for the emerging Local Plan is for a new Primary School in Woolpit which could serve both villages and be accessed by a new Pedestrian/Cycle link, however should the District Council be looking to support more housing in Elmswell this strategy would need to be revisited.”

- 1.10 The SCC planning applications consultation responses evidence that Elmswell is at a tipping point in respect of primary education provision in respect of existing sites/infrastructure addressing JLP growth and any additional proposals for growth. In order for the JLP growth strategy for Elmswell to be justified and effective it is clearly reliant on the delivery of the A14 pedestrian/cycle link and new primary school at Woolpit. However, the funding for the A14 pedestrian/cycle link has not been evidenced in the IDP, indeed, there is currently a significant shortfall in funding. Accordingly, the deliverability of the scheme is far from certain. Furthermore, it is not clear if further new pedestrian and cycleway infrastructure is needed to the south west of Elmswell in order to provide a safe connection to the A14 bridge/link. The IDP does not confirm if these works are required and if there is land available within their control to deliver such works. A reliance on any third-

party land would add to the questionable deliverability of the scheme.

- 1.11 In addition to the funding and deliverability concerns, the creation of A14 bridge/link is not the most sustainable and cost-effective solution. When taking a direct route, the new primary school site is approximately 1.8km from the centre of Elmswell (the true route via footpath will almost certainly be longer), this distance is a significant walk for pupils of a primary school age. It is suggested to the Council that pupils and parents utilising the new link to the primary school would be limited due to the distance of the walk/cycle link and safety concerns associated with crossing the A14 (even if there is a bridge), as well as the question mark over getting from Elmswell to the A14 crossing. Additionally, use of the bridge/link would be in darkness for several months of the year. From a social perspective, the proposed solution of making a proportion of primary school pupils travel to Woolpit will divide elements of the community and reduce social interaction and integration in the village. In addition, channelling pupils and parents to Woolpit will have a negative environmental impact in terms of increased use of the private car.
- 1.12 In representations made at the Regulation 18 and Regulation 19 stages, EESL, made it clear that the 'Land East of Eastern Way' was capable of providing land to deliver new primary education infrastructure in conjunction with a residential development. As detailed in the Site Promoter document accompanying our Matter 4 Statement the site is well related to the centre of the village and accessible to both vehicles and pedestrians. The Concept Plan in the Site Promoter document accompanying these representations identifies an indicative location for 2.4ha of land capable of accommodating a 2-form entry primary school (plus an additional 0.6ha of land for any future expansion project). Whilst the Concept Plan shows an indicative location for the primary school land to the south of the site, the final positioning will be informed by stakeholder and public consultation as part of the masterplanning process.
- 1.13 The prospect of providing land for new primary education infrastructure at the 'Land east of Eastern Way' as an integral part of an allocation for residential development is a far more logical, sustainable and cost-effective solution than the current strategy proposed for a link to Woolpit via the IDP. The site lies to the south of the

railway line, as such, it is possible to access the majority of Elmswell's service provision, the railway station and the A14 without crossing the railway line. The Facilities Plan within the Site Promoter Document (page 3) accompanying these representations provides an approximate indication of walking distances between the site and the village service provision. The majority of the service provision is within 800m of the site, with only a limited number of facilities located 800m-1km from the site. If demonstrated as being necessary, a development at 'Land east of Eastern Way' could also deliver improvements to pedestrian connectivity to the north of the railway line. These potential improvements would ensure that routes to the new primary school are safe and convenient for an even larger proportion of Elmswell.

- 1.14 By virtue of its inherent sustainability, Elmswell is a designated Core Village in the JLP Settlement Hierarchy (Policy SP03) and is capable of accommodating significant housing growth to accommodate the increasing housing needs of Mid-Suffolk and Babergh. The JLP represents a significant opportunity to plan positively for the growth of Elmswell in a sustainable manner, particularly when it comes to planning for important village infrastructure, such as education capacity. The JLP should proactively direct and guide the growth of the village by either allocating the 'Land East of Eastern Way' for residential development and land for a primary school. This will ensure that future residents of all proposed JLP Elmswell site allocations, such as LA065, have sustainable access to primary education infrastructure.
- 1.15 The current strategy to deliver new primary education infrastructure for Elmswell in Woolpit is not sustainable and is based on flawed and inadequate evidence. These shortfalls undermine the strategy to deliver housing growth at Elmswell. In the context of paragraph 35 of the NPPF, in respect of primary education provision in Elmswell, Policy LP33 is not **justified** by the IDP. The IDP will not facilitate the delivery of the required level of primary education infrastructure when planning applications come forward as there is an unknown (but significant) shortfall in the funding of the A14 link to Woolpit. In addition, the proposed new Woolpit Primary School is not a sustainable solution for Elmswell residents. As a consequence, in respect of primary education provision in Elmswell, Policy LP33 is not supported by a robust IDP and the policy is not **consistent with national policy** in terms of enabling and delivering sustainable development.

-
- 1.16 The 'Land East of Eastern Way' offers a sustainable and deliverable solution to providing the primary education infrastructure required to support the housing growth identified in the JLP. In addition, it will also future proof the ability of the village to support and benefit from housing growth beyond the level currently planned for in the JLP.