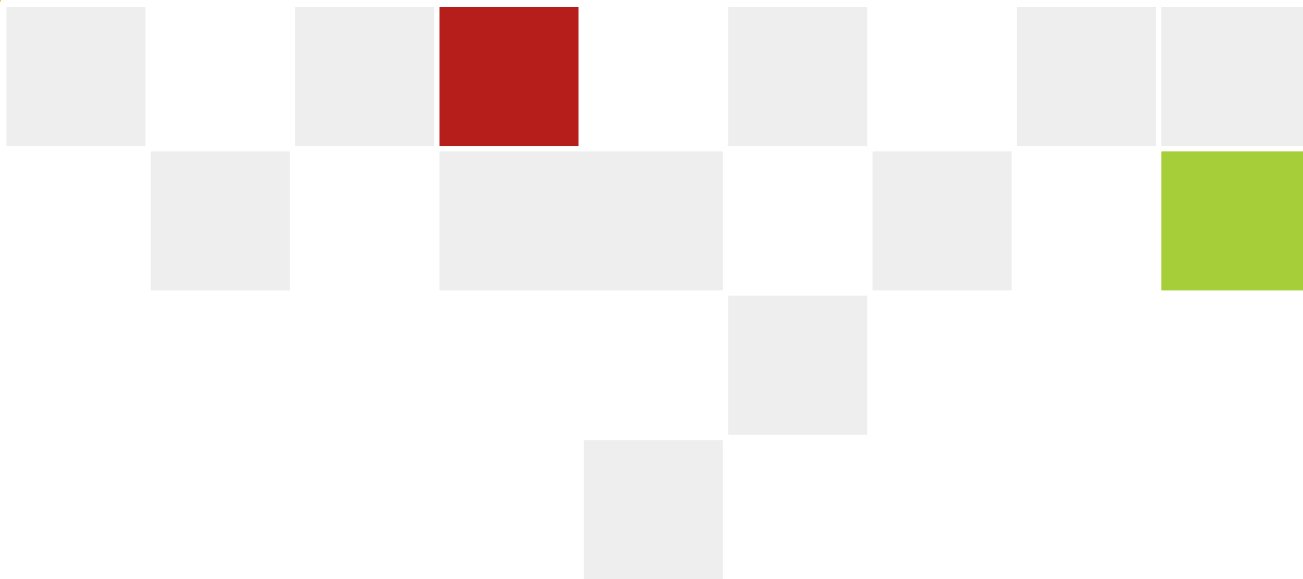


Babergh and Mid Suffolk Joint Local Plan Examination

Hearing Statement: Matter 8



Boyer

Report Control

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1. INTRODUCTION

- 1.1 This hearing statement has been prepared by Boyer on behalf of Taylor Wimpey UK Ltd., in response to the Inspector's questions relating to the Babergh Mid Suffolk Joint Local Plan Examination.
- 1.2 Taylor Wimpey UK Ltd. are pleased to see the identification of "Land north of the A1071, Sproughton" under Policy LA013 within the Joint Local Plan.
- 1.3 Land north of the A1071, Sproughton is identified in the Joint Local Plan for development of approximately 800 dwellings and associated infrastructure. The allocation demonstrates that the Council consider it to be a sustainable location for development and over the plan period will contribute to the delivery of housing across Babergh and Mid Suffolk. Taylor Wimpey UK Ltd. share this conclusion and are keen to work with the Council, statutory organisations and infrastructure providers to deliver the site.
- 1.4 The principle of the application is supported, Taylor Wimpey UK Ltd. do have objections to some aspects of the policy and specific requirements identified within the Joint Local Plan.
- 1.5 This hearing statement relates to Matter 8 – Healthy Communities and Infrastructure Policies. It is to be read in conjunction with the representations made in response to Regulation 19 consultation, and hearing statements submitted for different matters.

2. MATTER 8 – HEALTHY COMMUNITIES AND INFRASTRUCTURE POLICIES

- 2.1 On behalf of Taylor Wimpey UK Ltd., a number of questions from the Inspector's Matters and Questions have been addressed below. For ease of reference, the question number and questions have been provided along with a response.

Q8.1 a) Is policy SP08 consistent with national policy and other policies in the plan? b) Are the requirements of the policy clear and is there robust evidence to justify them? c) In broad terms will the policy be effective in ensuring the provision of infrastructure and local services necessary to meet future development needs? And in broad terms are there any types of infrastructure or schemes which are required to support future needs that are missing? [Note: matters relating specific infrastructure/service requirements to serve the plan's allocations for development will be considered as part of Matter 9] d) Does the policy take appropriate account of viability?

- 2.2 It is recognised and agreed that developments should be supported by the appropriate infrastructure to enable sustainable schemes to be delivered. The key strategic infrastructure projects listed under Policy SP08 are welcomed and it is also not disputed that all development should make provision for appropriate contributions towards community infrastructure.
- 2.3 It is noted that BMSDC have adopted the Community Infrastructure Levy as a method to finance infrastructure and ensure it is delivered in conjunction with service providers. The existing CIL Charging Schedule is being reviewed alongside the Joint Local Plan, but at this stage is yet to be examined. Therefore, although BMSDC charge CIL at this stage, it is difficult to understand how a revised Charging Schedule will impact on the provision and delivery of infrastructure and local services over the plan period.
- 2.4 This emerging Joint Local Plan has also allocated a number of sites on the fringes of Ipswich, with the largest of these being Land North of the A1071 (allocation LA013) to which this Hearing Statement relates.
- 2.5 Whilst it is recognised that strategic development will need to fund infrastructure through developer contributions, this should be carefully considered to ensure that the financial contributions are not "double counted", which may render schemes unviable. For example, the Councils' CIL Expenditure Framework (Document ER01) outlines that for education facilities, expansion of existing facilities will be met through CIL, whereas new build provision will be met through s106. On sites which are required to provide new education facilities there is a risk that the Councils will ask development to contribute twice (through s106 and CIL) which could bring into doubt the deliverability of the infrastructure.

- 2.6 In addition, for those allocations on the fringes of a neighbouring authority, such as emerging Policy LA013, land north of the A1071, Sproughton, it is considered that the onus should be on the relevant local authorities' to discuss how these contributions will be paid, whilst ensuring that no double-counting is made.
- 2.7 Wording to this effect should be included within this policy to ensure the policy is transparent and clear to the reader, particularly relevant statutory consultees.

Q8.2 a) Are the requirements of policy LP30 clear, justified and would they be effective? b) Is part 2 of the policy in particular consistent with national policy? On what basis was threshold of 1ha set and is this reasonable? c) Does the policy take appropriate account of viability? d) For the plan to be found sound should it: • designate and/or provide a mechanism to designate Local Green Spaces other than through a Neighbourhood Plan? • include the open space standards

- 2.8 It is agreed that sites should provide varying types of open space, and it is welcomed that there is recognition that the open space provided on a scheme should reflect the site's surrounding character and existing open space which may be available within its vicinity.
- 2.9 In the case of allocation LA013, to which this hearing statement relates, it has been agreed that the Site will provide informal areas of open space to reflect the Site's location on the urban edge of Ipswich and noting the other, more formal, areas of open space within the Site's vicinity.
- 2.10 That being said, these conversations have emerged through formal pre-application engagement discussions. As currently drafted, this policy wording is unclear and challenging in terms of confirming the level of open space required on a site from which to calculate the subsequent level of remaining development and therefore viability.
- 2.11 It is considered that an indicative Open Space Standard should be provided within the policy wording and referred to as a starting point, noting the need to remain flexible to ensure that development does not duplicate existing provision within the local area. This will ensure that local needs are met, whilst also providing greater clarity and transparency to the reader.
- 2.12 It is noted that the CIL charging schedule includes references to strategic open space, however, it is unclear how on-site open space provision interacts with CIL payments.

Q8.4 Are the requirements of policy LP32 clear and would they be effective?

- 2.13 Whilst it is recognised that Safe, Sustainable and Active Transport is an important aspect of new development, it is considered that minor text tweaks are required to Policy LP32 to ensure that it is clear and remains effective.
- 2.14 As currently worded, Policy LP32 suggests that all development should provide showers and changing facilities, with the term "where relevant" providing unclear guidance for the development industry and decision-maker.

- 2.15 It is not considered relevant or justified to require developments “(where relevant)” to provide showers and changing facilities.
- 2.16 It is considered that further clarification is required in respect of this.

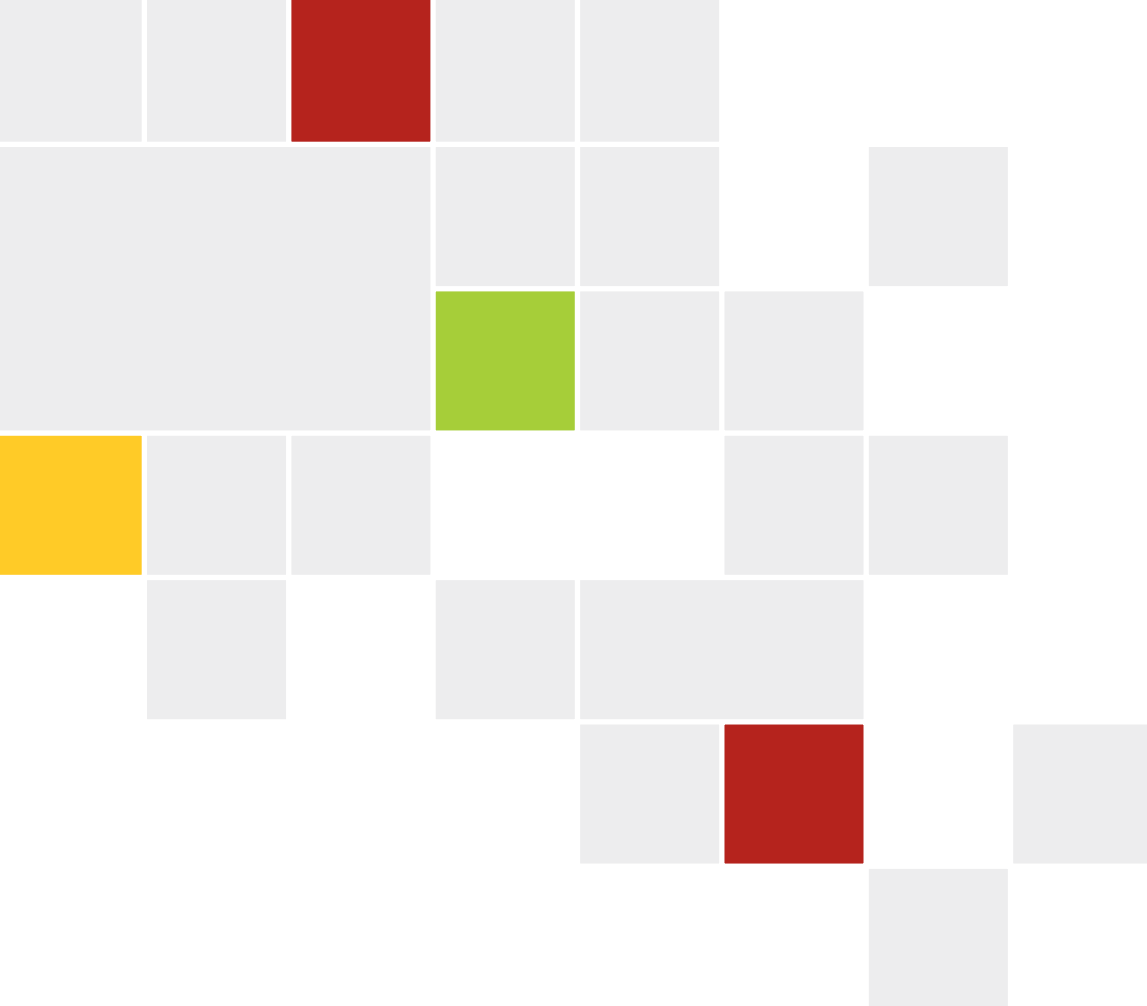
Q8.5 a) Does the Infrastructure Delivery Plan (Doc ER01) provide the robust evidence necessary to justify policy LP33? b) Is the policy clear and would it be effective particularly with regard to the need to address cumulative impacts?

- 2.17 It is agreed that the Infrastructure Delivery Plan (Document ER01) is an important evidence base document to support the Local Plan and it is recognised that there are a number of pieces of strategic infrastructure whereby the identified funding is unknown at this stage.
- 2.18 However, we have some concerns regarding the IDP in terms of whether it provides sufficient clarity to present itself as a robust evidence base document to justify Policy LP33, specifically in the context of the site at land north of the A1071, Ipswich (identified as allocation LA013).
- 2.19 One example, is the requirement for pre-school settings. The Infrastructure Delivery Plan (Core Document ER01, page 18) highlights additional provision for 2 new pre-school settings, whereas Policy LA013 only requires 1 new pre-school setting (together with the primary school).
- 2.20 The difference between the evidence base document and the emerging plan is unknown, but the variation in requirements may be the result of a larger number of dwellings being promoted by the Council in the Preferred Options (Regulation 18) stage, which was then reduced in the Submission stage document (Regulation 19).
- 2.21 In addition, within the IDP, a pedestrian/cycle bridge at Sugar Beet/Elton Park has been identified (Project Reference IDP093).
- 2.22 Taylor Wimpey do not dispute the benefit of delivering this piece of infrastructure, and are in agreement that it would assist in enhancing the connectivity of the more rural areas of Sroughton with Elton Park and the wider urban area of Ipswich.
- 2.23 It should be noted, however, that this pedestrian/cycle bridge is not necessary for the allocation at land north of the A1071 (LA013) to be acceptable in planning terms and it should be recognised that this bridge would provide a strategic connection, which will bring benefits to the wider area, rather than on an individual site basis.
- 2.24 The IDP does not provide any clarity with regards to how this piece of infrastructure should be funded, and there appear to be discrepancies between the project cost identified in Appendix A (£1.5 million) and the cost identified in Table 24 of the IDP (£2.5 million).
- 2.25 Taylor Wimpey are pleased to facilitate this link through their planning application (DC/21/02671), however the funding for this link should be via CIL contributions, supplemented by other forms of funding. This bridge should not be an entirely developer-funded piece of infrastructure.

- 2.26 With regard to Policy LP33, it is not disputed that regard should be given to the Council's Infrastructure Delivery Plan, and facilitating a link through the scheme at land north of the A1071 (allocation LA013) for the future delivery of this pedestrian/cycle bridge is considered sufficient to meet the requirements of this policy.
- 2.27 In the absence of any clarification with regards to how this particular infrastructure project will be funded, it is not considered suitable for anything further to be provided at this time.
- 2.28 It is considered that this Policy LP33 should make greater reference for sites to provide the infrastructure that is needed to make that site acceptable in planning terms.

Q8.6 a) Are the requirements of policy LP34 justified by robust evidence and are they clear? b) Are they sufficiently flexible and would they be effective?

- 2.29 It is recognised that appropriate education provision is an important aspect of ensuring that new development is acceptable.
- 2.30 It is also understood that "land locking of schools" is a concern for both the Local Planning Authority and the Education Authority. However, it should not be assumed that all schools will require future expansion, and in adopting such an approach this could lead to prime developable land being restricted from development which does not accord with the principles of sustainable development as promoted in the National Planning Policy Framework. It should be recognised that new development can provide improved facilities and educational facilities in more appropriate locations. As currently worded, it is considered that this policy is ineffective.
- 2.31 Land north of the A1071, Ipswich (allocation LA013) is required to provide 3ha of land for educational use. This parcel of land has been included within the site's Outline application (DC/21/02671) and has been carefully located following discussions with the County Council.
- 2.32 It should be recognised, however, that the proposed development and indeed the site's allocation (LA013) would not generate the quantum of school places or demand for requiring a school site of this size (3ha). In combination with the approved development to the south (known as Wolsey Grange) a total of 1275 dwellings would generate a demand for a 2.2ha school site, when calculated using the Suffolk County Council "Developers Guide to Contributions in Suffolk". The requirement for a larger school site would allow for overprovision of 80 places that would support a further 320 dwellings in the wider area.
- 2.33 We suggest that the policy should be amended to only require a 2.2ha school site, rather than a 3ha site. Alongside this, the policy wording should be amended to reference a need for there to be a clear demand for future expansion prior to protecting land adjacent to schools for the foreseeable future.
- 2.34 Moreover, land which is "future-proofed" for educational use, should not be protected from residential development indefinitely and this should be recognised through the wording of this policy.



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