

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

## **MAIN MATTER 8 STATEMENT**

**ON BEHALF OF MR TW BALDWIN**

**WORD COUNT: 987**



## **Pegasus Group**

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

- 1.1 The Joint Local Plan (JLP) and the adopted Eye Neighbourhood Plan (ENP) will facilitate the delivery of significant growth in and around Eye. This is entirely appropriate given the town's position in the JLP Settlement Hierarchy. The JLP seeks to make allocations for five residential sites capable of delivering approximately 472 dwellings, this is in addition to the 280 dwellings which already have an outline planning consent at Land south of Eye Airfield (M/3563/15/OUT). The ENP allocates the five sites identified in the JLP and the 280-dwelling scheme at Land south Eye Airfield.
- 1.2 To ensure the delivery of new homes is sustainable, infrastructure in the town needs to increase capacity and, in some cases, physically expand to address the additional demand. Paragraph 1.1.2 of the IDP (Infrastructure Delivery Plan) (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 on infrastructure, when they are to be provided, by which provider and how they will be funded.
- 1.3 To accommodate the growth in primary school pupils arising from the residential growth in Eye, the ENP confirms that the current primary school (St Peter and St Paul CEVAP) in the town has capacity for 210 pupils and that the growth afforded to the town by the ENP would likely generate demand for an additional 170 primary school places and 80 pre-school places. To address this new demand the ENP states that there is a planned scheme to expand the existing primary school to a capacity of 310 pupils. During the latter part of the ENP plan period there is also potential to expand the primary school again to accommodate 420 pupils. However, this second expansion would see pressure on the availability of land/space on the site and would require pre-school accommodation to provided elsewhere in the town.
- 1.4 Policy Eye 13 of the adopted ENP also seeks to allocate 'Land west of Hartismere High School' for educational purposes. The land shown on Figure 10 of the ENP is allocated as a 'reserve site' for educational purposes. This land is under the control of our client and forms part of the 'Land north and south

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of Castleton Way’.

- 1.5 Appendix A of the Infrastructure Delivery Plan (IDP) supporting the JLP identifies the following projects relating to primary school and early years provision capacity in Eye.
- IDP017: New 60 place pre-school – 0.1ha of land required at JLP allocation LA020
  - IDP033: Primary school expansion from 210 to 315 dwellings
- 1.6 Table 6 of the IDP states that the alongside the scheme to expand primary school capacity (IDP033) there is a ‘Masterplan to 420’. Table 16 of the IDP states that *“it has been confirmed by SCC that St Peter and St Paul Church of England Primary School can expand from 210 to 315 places (Phase 1) within its own site, however for expansion to 420 places (Phase 2) additional land may be required.”*
- 1.7 The ‘Masterplan to 420’ is not evidenced or detailed in IDP or JLP and it is not clear where the additional land to accommodate the expansion to 420 pupils will come from. 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).
- 1.8 The proposed JLP allocation LA020 is referenced in the IDP as needing to provide 0.1ha of land for a pre-school. However, the LA020 policy text does not state the need to provide this land as part of the scheme and simply refers the reader to the relevant ENP Policy. The relevant policy of the ENP, Policy Eye 9, does not reference the need for the site to deliver land for a pre-school.
- 1.9 In light of the above it is clear that there is a disconnect between the JLP and ENP in respect of addressing the town’s long-term primary education needs. The IDP does not identify a robust strategy to address primary education needs in the medium-long term of the plan period and fails to make reference to the role allocation of the ‘reserve site’ for ‘educational purposes’ in the ENP.

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- 1.10 Given the land constraints associated with the long-term expansion of the existing primary school and the content of the IDP it is apparent that the most logical and sustainable solution is to deliver a new primary school in Eye. The 'Land west of Hartismere High School' is available and is being promoted for residential development (as part of the land north and south of Castleton Way – Phase 3) with the potential to accommodate land for a primary school, through the JLP.
- 1.11 Despite our client's previous representations on this matter the IDP and the JLP has failed to take the lead on this issue and allocate our client's Phase 3 land to the north and south of Castleton Way (which includes the 'Land west of Hartismere High School') for residential development and land for a primary school. To facilitate the release of the land identified by adopted ENP Policy 13 the JLP needs to allocate additional residential development at our client's Phase 3 land. This would be entirely appropriate given the sustainability credentials of the town, location of the land and the need to view housing targets as a minimum.
- 1.12 The strategy put forward in the IDP is not effective and not consistent with adopted ENP and national planning policy as it will not enable the delivery of sustainable development in Eye.