

Matter 9 – Allocation Sites for Housing and Other Development and Settlement Boundaries

Authors

Cameron Clow

9.1) Are the sites allocated for housing and other development in policies LS01(1-90) and LA001 – LA119 soundly-based; are the criteria and requirements set out in the relevant policies justified and effective; and is there evidence that the development of the allocations is viable and deliverable in the timescales indicated in the Housing Trajectory set out at Appendix 01 of the plan?

Many of the proposed changes to site specific policies proposed by SCC are the same, or very similar. For clarity, SCC will set out justification for amendments and list the appropriate amendments under each policy in the- “Summary of Amendments” list in Appendix 1. SCC considers these amendments are necessary to make the plan effective, consistent with national policy and therefore sound

Archaeology

A small number of site specific archaeological recommendations were made by SCC which were not included in the submission draft of the plan. These recommendations were made so that there was a clear direction for developers on each site to positively address the historic environment, as required by paragraph 190 of the NPPF. In order to ensure that site specific policies are effective at addressing archaeological heritage and that they are in line with national policy amendments have been included in the “Summary of amendments”.

Education – Primary, Secondary and Sixth Form

While SCC is content with education strategies in the Infrastructure Delivery Plan (IDP). However, in order to effectively deliver the infrastructure, policy needs to set clear expectations for developers with regards to land allocations. A number of sites needed for educational use are not formally allocated in policy. The land identified in table 16 of the IDP should have their own allocation policies in order to safeguard them for educational use. These sites are:

- Former Bacton Middle School (Amendment to LA046 provided in “Summary of Amendments)
- Land for School Playing Field, Bentley
- Land for Hintlesham and Chattisham Primary School
- Land for Laxfield All Saints Primary School

SCC needs to highlight a change in its position relating to the need for a school to be allocated on site LA078

At the regulation 19 consultation for the plan SCC requested that the following change was made to LA078. It currently states that “If required at the time of a planning application, a free serviced site of 3ha should be reserved for the setting of a pre-school and primary school”. SCC stated that in order for the policy to be effective, and therefore sound, the pre-school and primary school elements of these policies should be separated. The catchment Primary school for this site is Freeman

Primary School in Stowupland. Based on current school forecasts the sites in Stowupland would take Freeman Primary over capacity.

Freeman Primary School, is an academy and as such has control over whether or not it expands. Freeman has expressed to the county council that it wishes to stay the same size and focus on serving the local community. For this reason SCC previously requested that land for a school was set aside on this LA078 as a contingency. However, on reviewing the school population there is a high proportion of out of catchment pupils attending Freeman. There is capacity at the schools these out of catchment pupils, which are Trinity Community Primary School and Cedars Park Primary School.

SCC is now of the view that due to the high level of out of catchment pupils attending Freeman Primary School and the available capacity in those other catchment schools, the available school capacity can be managed through the schools admissions process, which prioritises pupils whose parents have selected the school closest to them. Therefore the primary school site at LA078 is no longer needed.

However, there is a deficit of capacity for early years in Stowupland, as such the early years setting on LA078 will still be required. The policy should be amended to require an area of land 0.12 hectares in size to meet the early years needs arising from LA078.

SCC would also like to raise an additional issue in relation to the allocation LA028 in Hadleigh. SCC were previously not aware that this allocation is split between multiple landowners, with different developers bringing forward different parts of the site. In order for the plan to be sound, SCC consider it is necessary to specifically allocate the area of land shown in table 16 of the IDP that will enable Hadleigh High School to expand. As mentioned above the contents of table 16 are not policy allocations. Formal allocation will provide clarity to landowners, developers and decision makers, what land is expected to be provided to SCC for the purposes of expanding Hadleigh High School. As currently written Policy LA28 does not specify what land is required for the playing fields, just that an area of land 1.2ha in size is required. Specifying what land will make the plan sound in relation to NPPF paragraph 16.d) which states plans should “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”

Flood Risk and Water Management

NPPF paragraph 167 states that applications should be supported by a Flood Risk Assessment (FRA) where appropriate. The Strategic Flood Risk Assessment identifies sites that require a FRA, however these requirements have not been identified in policy in all cases. Two sites (LA104 and LA118) were not identified as needing an FRA, but in SCCs view as the Lead Local Flood Authority they do. Amendments for each relevant policy have been included in the Summary of Amendments.

Transport

A number of site-specific recommendations by the Highway Authority have not been included in site allocation policies. In order to effectively identify and mitigate transport impacts and align with NPPF paragraph 113, a number of policies should state the requirement for a transport assessment or transport statement. Where this

amendment is needed it is listed under each relevant site in the “Summary of Amendments”

Public Rights of Way

NPPF paragraph 100 states that Public Rights of Way (PRoW) should be protected and enhanced. SCC made number of policy recommendations related to site allocations where PRoW are either within or near to specific allocations. Most of these recommendations have been included in the plan, however some were omitted. Where amendment to address this it is listed under each site in the “Summary of Amendments”

9.6) Is the “contributions to the satisfaction of the LPA, towardsxxxx” wording used in many of the LAXXX policies justified and effective? Would “contributions towardsxxxx, to ensure that the development is acceptable in planning terms” be more appropriate?

SCC did not raise this as an issue in its regulation 19 consultation response, however considers that “contributions towards ...XXX, to ensure the development is acceptable in planning terms” would be the more appropriate wording.

Appendix 1: Summary of Amendments**LA001.**

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA002

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA006

“Measures for managing impacts on archaeological remains are provided, including archaeological excavation will be required”

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA007

“Measures for managing impacts on archaeological remains are provided, including preservation in situ of the known double ring ditch, and archaeological excavation”

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA008

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA009

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA010

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA011

“A transport statement is needed to determine existing and projected capacity and any mitigation required.”

LA012

“Rights of Way within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport.”

LA013

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

“Rights of Way within and nearby the site should be protected and enhanced to enable access to the countryside and enable active transport.”

LA016

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

“This site will require a transport assessment to determine existing and projected capacity and any mitigation required.”

“The existing pedestrian access to the site is a narrow footway, which may require improvement.”

LA020

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

“Policy should require a transport assessment to determine existing and projected capacity and any mitigation required.”

“Policy should require footway improvements along Magdalen Street”

LA021

“Policy should require a transport assessment to determine existing and projected capacity and any mitigation required.”

LA022

“Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport”

LA028

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA031

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA032

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA033

Policy should require a transport assessment to determine existing and projected capacity and any mitigation required.

“Provision of a controlled pedestrian crossing may be required” (Note: this should be recognised in the IDP)

“Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport.”

LA036

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA037

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA039

“Nearby Rights of Way should be protected and enhanced to enable access to the countryside and enable active transport.”

LA040

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

Nearby Rights of Way should be protected and enhanced to enable access to the countryside and enable active transport.

LA041

“Nearby Rights of Way should be protected and enhanced to enable access to the countryside and enable active transport.”

LA044

Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport.

LA045

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA046

"V. 1.7 ha of land is made available for the relocation of Bacton Primary School"

LA050

A Right of Way forms part of the boundary for this site. This should be retained and enhanced, to enable access to the countryside and active transport.

LA051

"Rights of Way should be protected and enhanced to enable access to the countryside and enable active transport." (Note: the policy does mention PRoW, however SCC consider that it is appropriate to highlight the expected outcomes of retaining and enhancing PRoW).

LA054

"Nearby Rights of Way should be protected and enhanced to enable access to the countryside and enable active transport."

LA056

"A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding."

"In addition to the criteria set out in the Debenham Neighbourhood Plan, a transport statement is required to determine existing and projected capacity and any mitigation required."

LA057

"In addition to the criteria set out in the Debenham Neighbourhood Plan, a transport statement is required to determine existing and projected capacity and any mitigation required."

"To ensure a safe route to school a footway should be provided."

LA058

"In addition to the criteria set out in the Debenham Neighbourhood Plan, this site will require a transport assessment."

"The site will require footway access and to ensure a safe route to schools."

LA063

"Policy should require a transport assessment to determine existing and projected capacity and any mitigation required."

"A footway link to the existing network is required."

LA064

"A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding."

LA065

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA068

“Nearby Rights of Way should be protected and enhanced to enable access to the countryside and enable active transport.” (Note: the policy does mention PRow, however SCC consider that it is appropriate to highlight the expected outcomes of retaining and enhancing PRow).

LA075

“An archaeological assessment and measures for managing impacts on archaeological remains will be required”

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA076

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA078

“X. A free, serviced site of 0.12ha should be reserved for a pre-school setting;

LA080

“In addition to the criteria set out in the Stradbroke Neighbourhood Plan, this site will require a transport assessment.”

LA081

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

“In addition to the criteria set out in the Stradbroke Neighbourhood Plan, this site will require a transport assessment.”

LA082

“In addition to the criteria set out in the Stradbroke Neighbourhood Plan, this site will require a transport assessment.”

LA083

“In addition to the criteria set out in the Stradbroke Neighbourhood Plan, this site will require a transport assessment.”

LA085

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

“The site will require a transport statement to determine existing and projected capacity and any mitigation required.” (Note: the IDP should note the need for carriageway widening with the footway required along Church Road)

“Contributions towards additional bus stops in the village may be required.” (Note: this should be included in the IDP)

LA086

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA087

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA089

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA093

“Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport”

LA094

“Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport. There is an opportunity to connect rights of way to the north and the east of the site.”

LA095

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

“The Rights of Way network should be developed within and within the vicinity of this site to enable access to the countryside and active transport”

LA096

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA097

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

“Policy should require a transport statement to determine existing and projected capacity and any mitigation required.” (Note: the IDP should state that that this site will likely require widening of the carriageway)

“Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport”

LA098

“Public Right of Way on southern boundary of site should be retained and enhanced, to enable access to the countryside and active transport”

LA099

“An archaeological assessment and measures for managing impacts on archaeological remains will be required

LA100

“Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport”

LA104

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA118

“A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.”

LA166

Measures for managing impacts on archaeological remains are provided, including archaeological excavation.