

**Brantham Regeneration Area  
(Main Modification 25)**

**WRITTEN REPRESENTATIONS ON BEHALF OF MR PAUL PRICE**

**Matter:** Is the proposed inclusion of additional land for open space and housing ('Proviso D land') between the Regeneration Area and the existing settlement necessary and justified by the evidence base?

**Specific questions:**

1. *The landowners have stated that, without Proviso D, the original policy CS6a is not deliverable, and that the viability evidence (March 2013) indicates that the scheme would be viable and deliverable with the inclusion of up to 600 dwellings (c.320 on the 'Proviso D land'). Although Proviso D does not give an absolute commitment to a major element of housing development the joint viability group, including BDC, was looking at the costs and other models of development. To what extent is the inclusion of the Proviso D land now supported by evidence?*

Further evidence dated 28<sup>th</sup> March 2013 **L18** appears to form the basis of the Council's case. We are aware that the joint viability group comprised SFG, BDC and the HCA/Atlas. There is no evidence that we are aware of that the submitted summary has been rigorously examined by any independent experts.

2. *Are there any known constraints affecting the Proviso D land, and how might these be overcome: access, water, sewage?*

Evidence is available confirming constraints including access, water, sewage treatment and education facilities. Water and sewage treatment are usually capable of technical solutions. Access is poor and although S278 Highways Act works have been costed from A137 to Factory Lane no details have been provided to show the effect on existing residents and their properties. More fundamentally, the costings do not include details of off-site works at Manningtree or to the north on A137. S106 costs do not appear to include such provisions. It is also unclear how transport enhancement will be provided of the scope included.

3. *Given its potential scale should this development be specifically included in the table of housing developments in Policy CS2? (It was previously included, then removed).*

We submit that the scale of development now envisaged is clearly strategic in character, being the second largest capacity, and should be included in Policy CS2 table together with a reduction in windfall assumed and/or Core and Hinterland villages.

4. *How does the potential scale of the development affect the overall housing figures, including the amount of development allocated to Core and Hinterland Villages?*

Greater transparency is required to tease out the new land allocations including Core and Hinterland Villages. Brantham is currently a Hinterland Village and one would assume that the 1050 units would include the final out-turn from Brantham.

However, this may not be the case, given the previous alterations to the table in Policy CS2 and the increased windfall allowance.

5. *Would the scale of the development be proportionate to the existing settlement and its facilities?*

We submit that the Proviso D proposals are wholly disproportionate to the existing settlement and its facilities. Local views on this are to be noted and are supported. The proposals are hardly 'Sustainable Development' as described in the NPPF paragraph 14.

6. *Is the loss of open countryside justified by the evidence base, and have all options using brownfield land been thoroughly explored?*

We submit that the loss of open countryside on the scale proposed is not justified by the evidence base and would be contrary to the NPPF Core Planning Principles including the need to recognise the intrinsic character and beauty of the countryside (paragraph 17). We have seen no clear evidence of alternative options for the use of the brownfield land.

7. *Given the scale of the proposed development, is it appropriate that Brantham remains a Hinterland Village?*

Having regard to the scale of the proposed development Brantham will not remain a typical Hinterland Village and should be redesignated as a Core Village. It is not clear that the Council have addressed the implications of this which would be a further Main Modification.

8. *How would the Proviso D housing development and the employment regeneration on the original allocation site be linked and phased?*

Given the justification put forward for the Proviso D housing development it will be essential for the employment regeneration to be linked and phased in order to ensure effective delivery of all elements of the proposals within the plan period.

9. *Has sufficient public consultation and engagement been undertaken to consider the inclusion of the Proviso D land at this stage?*

Brantham Parish Council and local residents appear to have strong concerns at the adequacy of public consultation and engagement. However, we submit that the public response to the Main Modifications consultation demonstrates that the legal requirements for effective consultation have been met. This is reinforced by the Inspector's decision to re-open the Examination. Nonetheless, the inclusion of Proviso D land should not be a foregone conclusion.

## **CONCLUSIONS**

We submit that there are justifiable concerns by local residents and Brantham PC at the prospect of Proviso D proposals in addition to the committed regeneration site proposals. These raise fundamental issues of soundness including consistency with national policy and internal consistency within the draft Core Strategy as well as effectiveness of the Policy CS6a package.

We respectfully remind the Council that in the event that Proviso D is found to be unsound viable alternative and more sustainable sites remain available in the district, including land at Hook Lane Hadleigh, which can be brought forward early in the plan period in order to meet local housing needs and contribute to the significant boosting of the supply of housing.

J R Shephard  
16 September 2013