

BABERGH DEVELOPMENT FRAMEWORK

CORE STRATEGY (2011-2031) SUBMISSION DRAFT AND MAIN MODIFICATIONS (JULY 2012)

REPRESENTATIONS ON BEHALF OF MR PAUL PRICE

What are the implications for the Core Strategy of the revocation of the Regional Strategy (the East of England Plan) in particular the devolution of housing and other targets to the local level

1. INTRODUCTION

- 1.1 Mr Paul Price is a local landowner with interests at Hook Lane Hadleigh. He has made representations on a number of aspects of the Core Strategy at all stages of the plan process including the 'Call for Sites' and the Main Modifications to the BDFCS.

2. BACKGROUND DOCUMENTS

- 2.1 The following documents have been considered in preparation of this representation:
- Babergh Core Strategy (2011-2031) Submission Draft – October 2011 **E01**
 - Schedule of Proposed Main Modifications – July 2012 **E02**
 - Technical Background Document 4 : Approach to Homes and Affordable Homes (Version 2) – July 2012 **D42**
 - National Planning Policy Framework – March 2012 **B09a**

3. REPRESENTATION

- 3.1 Babergh Core Strategy Submission Draft **E01** outlines the level of Housing Growth at paragraph 2.4. The Schedule of Proposed Main Modifications (July 2012) **E02** proposes revised text and table to replace paragraph 2.4. This text appears to indicate that the level of Housing Growth is derived from a capacity led 'bottom up' approach.
- 3.2 This is further explained in Technical Background Document 4 : Approach to Homes and Affordable Homes (V2 July 2012) **D42**. Paragraph 2.3 examines requirements 2001-2021, together with Adopted RSS roll forward 2011-2031 (due to under-provision 2001 and 2011).
- 3.3 Paragraph 2.4 then outlines the reasons for the Preferred Option and concludes that the total planned supply falls very close to the RSS figure. The Council conclude that the proposed level of provision is in general conformity with the adopted RSS.
- 3.4 We can see no evidence that the proposed level of housing provision is based on a strategy which seeks to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing

market area, together with the objectively assessed development and infrastructure requirements, consistent with achieving sustainable development.¹ Instead the Council appear to be promoting a capacity-led approach in parallel with the historic RSS requirements.

- 3.5 Accordingly, we conclude that RSS which has now been revoked forms a significant part of the Council's 'evidence base'. This effectively removes the broad yardstick against which the Council has sought to justify its capacity-led approach. We conclude that this further weakens an already flawed methodology.
- 3.6 We invite the Inspector to find that in the absence of the RSS targets the Council should fundamentally re-assess the housing and other targets for the Core Strategy in accordance with the National Planning Policy Framework, in order to deliver a 'sound' plan.

J R Shephard
21 January 2013

¹ National Planning Policy Framework paragraphs 47 and 182