

Annette Feeney
Programme Officer
c/o Mid Suffolk District Council
Planning Policy
131 High Street
Needham Market
Ipswich
IP6 8DL

06 June 2012
Our Ref: C-0153286

Dear Ms. Feeney

Mid Suffolk Local Development Framework - Core Strategy Focused Review National Planning Policy Framework and 'Model Policy' Consultation

We write on behalf of our client, CEMEX UK Ltd to submit representations in relation to the Mid Suffolk Core Strategy Focused Review National Planning Policy Framework (NPPF) and 'Model Policy' Consultation.

Nationally, CEMEX owns a number of strategic sites which are either due to, or have already ceased being in operational use. In accordance with National Planning Policy, CEMEX is seeking to promote these sites for alternative uses.

Within the District of Mid Suffolk, CEMEX owns one site, which is a greenfield site at Lorraine Way, Bramford, which has potential to help provide for the district's housing requirement (site plan attached).

CEMEX responded to the Core Strategy Focused Review Regulation 25 Consultation in December 2011 and the Proposed Submission Consultation in February 2012.

Bramford Site

The Bramford site is a greenfield site adjoining the settlement of Bramford. It is located outside of the settlement boundary. Bramford was identified as a Key Service Centre Settlement within the adopted Core Strategy settlement hierarchy.

Areas to the north of the site (Bramford Common) are located as land for quiet countryside recreation and water based facilities by saved Local Plan policies. The Suffolk water park is identified as a special landscape area and area of quiet countryside recreation for water based facilities.

As previously stated in representations, CEMEX consider that the southern section of the site at Bramford could be developed to accommodate some of the district's greenfield housing requirement. It is also considered that meeting this housing requirement is a valid justification for the release of greenfield or

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agricultural land. The site at Bramford would provide a suitable extension to the existing settlement, recognised as a Key Service Centre in this part of the district, close to existing facilities and infrastructure.

Any development would be mindful of the visual and transport impact it would have on the surrounding area and consideration would also need to be given to drainage and flooding.

NPPF 'Model Policy'

CEMEX welcome the wording of the NPPF 'model policy', recommended by the Inspector for inclusion in the Core Strategy Focused Review and agree that the wording is appropriate to further incorporate the presumption in favour of sustainable development in the NPPF into the Mid Suffolk Core Strategy Focused Review.

At present, the Core Strategy Focused Review includes references to the draft NPPF and the 'presumption towards sustainable development'. CEMEX support the maintenance of references throughout the Core Strategy Focused Review to the NPPF's 'golden thread' of sustainable development in addition to the 'model policy', although note that the NPPF has now been adopted and the document will need to be updated accordingly. CEMEX welcome this 'model policy' because it supports proposals for development at Key Service Centres like Bramford.

Bramford is identified as a Key Service Centre, with existing infrastructure. The Mid Suffolk Core Strategy Focused Review Sustainability Appraisal Note for Regulation 27 Proposed Submission (December 2011) states that the provision of new development in key centres is likely to improve access to key services and facilities, including health facilities, schools, employment, retail and community facilities. It also states that allocating new housing development in key centres will help ensure good accessibility to the existing and new employment opportunities within the District and would help reduce commuting. Finally, it adds that new development is likely to be of high quality and supported by improvements to the infrastructure, increasing general attractiveness of the district's main settlements for potential investors. In the context of the NPPF, settlements such as Bramford, provide opportunities for sustainable development to meet objectives and to support rural services.

Allocations for housing on greenfield and previously developed land in key service centres such as Bramford remain unchanged by the review. Paragraph 55 of the NPPF states that housing should be located where it will enhance or maintain the vitality of rural communities to promote sustainable development in rural areas. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. As a Key Service Settlement, Bramford is such a location, suitable for rural housing and serving the wider hinterland.

CEMEX's site is in a sustainable location, would provide a natural extension to Bramford and would be well supported by existing facilities and infrastructure. These characteristics also support Paragraph 7 of the NPPF which states that the planning system should perform an economic, social and environmental role. Furthermore, the SHLAA acknowledges that part of the Bramford site may be suitable for development.

CEMEX supports the maintenance of the allocation of 450 homes on greenfield land in the Key Service Centres. These figures are not ceilings and CEMEX highlights Bramford as a suitable site for greenfield release for housing to assist in the delivery of this target.

Summary

CEMEX considers its site on Lorraine Way, which acts as a natural extension to Bramford, a Key Service Centre, has potential to accommodate growth and should be considered for residential or mixed use

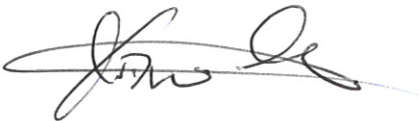
development to help provide for the district's housing requirement. The CEMEX site is in a sustainable location, would provide a natural extension to Bramford and would be well supported by existing facilities and infrastructure. These characteristics support the presumption in favour of sustainable development set out in the 'model policy' and paragraphs 7 and 55 of the NPPF. CEMEX welcome this 'model policy' because it supports proposals for development at Key Service Centres like Bramford.

On behalf of CEMEX, we request that we be kept informed of progress with this and future LDF documents, and wish to reserve our client's position to submit further representations on subsequent documents.

We welcome the opportunity to meet to discuss any aspect of these representations with you, please do not hesitate to contact me if you require further information regarding this matter.

Please contact Robert Devas on 020 7303 3051 if you require any further information regarding this matter.

Yours sincerely



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John Adams

for Deloitte LLP (trading as Drivers Jonas Deloitte)

