



Mid Suffolk Core Strategy Focused Review (CSFR) Examination Main issues and questions

Representations on behalf of Taylor Wimpey

1.0 Legal Compliance

1.10 Does the CSFR comply with the policies of the Framework and does the CSFR adequately address the national presumption in favour of sustainable development?

Please see comments recently submitted in respect of the NPPF in relation to both the CSFR and SAAP, dated June 2012.

1.11 Has the CSFR had regard to national policy? Is the CSFR consistent with the National Planning Policy Framework (NPPF or the Framework)? Are any modifications necessary to make the CSFR sound as a result of the publication of that document?

Please see comments recently submitted in respect of the NPPF in relation to both the CSFR and SAAP, dated June 2012.

1.12 Does the CSFR sufficiently reflect the presumption in favour of sustainable development that Local Plans are expected to follow? Should the CSFR be modified to include the model sustainability policy? How would that affect policy FC1?

Please see comments recently submitted in respect of the NPPF in relation to both the CSFR and SAAP, dated June 2012.

1.13 Whether the plan period is sufficiently clear throughout the CSFR, how that complies with NPPF and how it fits-within the context of the original document. Whether there are any implications for cross-boundary working.

It is considered that the Plan Period is clearly stated and that it is appropriate that this remains consistent with the Adopted Core Strategy in view of the fact that this represents a focused review dealing with a limited number of issues. Consistent with the approach of the LDF/Local Plan as a whole the CSFR seeks to plan for a 15 year period and in turn to address longer term requirements.

3.0 Employment

3.8 What would be the environmental impact of the allocations of land that is not previously developed and would any identified be outweighed by other matters? If so what would those be? What is the agricultural quality of the land allocations and is there poorer quality land that should be used in preference.

The environmental impact of the proposed development at Chilton Leys, including the proposed allocation of 2.14ha of employment land is considered to be minimal, particularly having regard to the scope for inclusion of mitigation measures within any development proposals. Assessment work conducted to date confirms that the site, which is currently subject to an agricultural regime, is relatively devoid of ecological interest, whilst the size of the development area as a whole offers opportunities for retention of existing features such



as hedgerows, trees and ponds, and for habitat creation and enhancement measures within the substantial areas of open space envisaged. This is summarized within the Deliverability Statement which accompanied representations to the SAAP, dated August 2011.

3.9 Are the Use Classes specified sufficiently flexible or would they unduly restrict business opportunities, and restrict potential deliverability. Is the mix of uses proposed on sites satisfactory? What are the implications of the split in uses on job delivery? Should the split of uses be better identified in policy FC3?

It is generally accepted that the types of uses specified for the employment sites would be appropriate and that the focus of the uses at Chilton Leys on B1 and B8 uses would be more compatible with accompanying residential uses. This would also complement the fuller range of employment uses proposed at the Mill Lane site.

It is however also agreed that a degree of flexibility will need to be applied to enable consideration of alternative employment generating uses at application stage, particularly given current economic conditions. It is conceivable that a number of such uses would be appropriate at Chilton Leys in particular. It is acknowledged that this flexibility is potentially provided through reference to other commercial uses being acceptable on employment sites shown on the Proposals Map where there is no sequentially preferable site available.

At the Chilton Leys site uses such as a gym, car showroom or hotel for example may be attractive and would not be inappropriate in planning terms, having regard to compatibility with surrounding residential uses, the presence of a residential catchment and proximity to the strategic highway network in the case of the latter, whilst existing and proposed public transport links would also support such uses.

3.10 Is there potential for large scale leisure or retail development coming forward on employment sites? If so what would be the implications?

In accordance with the response above it is considered that there is potential for leisure or retail development to come forward on the employment sites, and that such an approach would appear to be acceptable, especially at Chilton Leys where an immediate residential catchment would be present. In the context of the Chilton Leys site the examples of non B-Class uses referred to above would not appear to harm the vitality and viability of town centres and other centres in the District. Reference to the scope for such alternative uses is felt to be consistent with the encouragement that should be given to sustainable economic growth which is also set out within the NPPF, especially in the context of reference at Para. 21 to ensuring that policies are flexible enough to respond to changing circumstances.

3.11 Are the allocations realistic and deliverable? What are the implications of current economic conditions?

The deliverability of the land at Chilton Leys, including the employment land, is addressed within the deliverability statement that accompanied representations to the SAAP, dated August 2011. Under the current economic circumstances the rate of take up of employment land cannot be assured and therefore it is considered that a flexible approach to non B-Class uses is warranted, subject to regard being had to other planning principles, as referred to above.



4.0 Housing

4.2 Whether the quantity, location, nature, density and affordability of housing would comply with national policy and the RS.

It is considered that the amended housing policy contained within FC2 presents an acceptable distribution of housing that would comply with the East of England Plan and the NPPF. In respect of the former the amount of housing, and specifically the increase introduced within the CSFR, is consistent with the RS, which treats housing figures as minimum levels and would support the focusing of housing at Stowmarket, the District's principal market town (Policy SS4).

The extent to which the SAAP addresses these issues has been covered with our Matter 2 statement (2.1) to the SAAP Examination.

4.4 Would the CSFR comply with NPPF section 6 *delivering a wide choice of high quality homes?*

The CSFR itself does not directly address this issue, which is dealt with either within the Adopted Core Strategy or the SAAP, due to its limited focus. Although the CSFR does not directly allocate sites those proposed through the emerging SAAP includes a range of sites that make up the distribution of housing that is set out in Policy FC2. As such it is felt that choice will be provided, although the detailed policies that will govern these aspects are appropriately addressed more fully in other existing and emerging elements of the Development Plan.

4.6 Are the amounts of housing shown for the sites realistic and achievable? How have the quantities been worked out and could the sites provide more than specified in the allocations?

The CSFR does not specifically identify housing sites or set specific housing numbers for individual sites. These are contained in the more detailed emerging SAAP. The housing numbers identified for Chilton Leys in that document are still considered to be both realistic and achievable, and have been suitably phased over the 15-year plan period. The assessment of quantities and calculations has been previously set out in Boyer Planning's response to SAAP Matter 2.1.4.

4.9 Whether housing allocations skew development further towards Stowmarket and whether the proportions allocated to Stowmarket are adequate.

The CSFR does not specially identify housing allocations, as these are set out in the more detailed documents such as the emerging SAAP. A similar question in relation to housing allocations skewing development further towards Stowmarket was asked as part of the SAAP Matters and Issues, and comments upon this are set out in Boyer Planning's response to SAAP Matter 2.1.13.

Since this time MSDC has taken the opportunity presented by the CSFR to review its housing figures. This represented an opportunity for the Local Authority to review its housing figures and its housing distribution across the whole District, and was not limited to Stowmarket. The results are set out in the table in Policy FC2, which show that housing has been increased or reallocated across the District. It is considered this has been carried out appropriately and proportionately by MSDC, and is in accordance with the



Settlement Hierarchy in adopted Core Strategy Policy CS1. The general housing distribution within the CSFR therefore accords with the principle of sustainable development, and is in accordance the NPPF.

4.13 Are the housing policies sufficiently clear and robust to deliver new residential development which will address the need for differing household sizes and for diverse groups?

It is considered that the CSFR itself does not especially provide the policy basis for ensuring that these needs are met. However this would appear to be an issue that is either addressed within the body of the existing Core Strategy, or is more appropriately dealt with in the more detailed policies of the SAAP.

4.14 Are the phasing periods realistic? What are the implications of the current economic conditions? What account has been taken of availability?

In view of the scale of development proposed at Chilton Leys it is envisaged that development of this site will be phased across the Plan Period as a whole, assisting in the provision of a continuous land supply over this timeframe. Plans have been provided in the context of the SAAP which illustrate the proposed approach to the phased development of the site consistent with this. Any slowing down in the rate of delivery as a consequence of the economic climate should not have any significant implications and in this context the quantum of development proposed will provide the flexibility required to respond to changing circumstances, as required by the NPPF.

4.15 Whether the CSFR will assist in the provision of affordable housing. Whether sufficient provision would be made for the infrastructure requirements of housing development. Whether viability is sufficiently accounted for.

It is felt that the CSFR itself is not necessarily the vehicle for consideration of these issues, which are either already addressed within the Adopted Core Strategy, or appropriately dealt with in greater detail within the SAAP. As such the CSFR does not specifically cover the issue of affordable housing or infrastructure provision directly. Comments on the degree to which the SAAP will assist delivery of affordable housing are set out in relation to question 2.1.4 of our statement to the SAAP Examination (Matter 2.1).

