

Mid Suffolk Core Strategy Focused
Review EIP
Hearing Statement – Main Issue 4

CEMEX UK LTD

Representor Reference: CSFR-ProSub21 and CSFR-ProSub38

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Introduction

This statement has been prepared by Drivers Jonas Deloitte on behalf of CEMEX UK Ltd to respond to the following matters raised by the inspector as part of the Mid Suffolk District Council (MSDC) Core Strategy Focused Review (CSFR) Examination Hearings:

- Main Issue 4 - Housing

All responses to the Inspector's issues are made in the context of the CEMEX site at Lorraine Way, Bramford.

Lorraine Way, Bramford

Within the Mid Suffolk District area, CEMEX own the site at Lorraine Way, Bramford. This site comprises of open land currently in agricultural use.

These representations relate to an area of up to 17.5 hectares that CEMEX wish to promote for residential development. A site map of the plot was included as part of representations submitted in response to the pre-submission draft CSFR Consultation. The address of the site is as follows:

CEMEX Bramford

Lorraine Way

Bramford

IP8 4JS

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 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 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.

CEMEX has previously submitted representations in respect of this site in response to consultations for the following LDF documents and evidence base:

- Core Strategy Key Service Centres Issues and Options (2006);
- Core Strategy Final Issues and Options (2007);
- Core Strategy Preferred Options (2007);
- Development Control Policies Issues and Options (2007);
- Core Strategy Submission Draft (2007);
- Site Specific Allocations Issues and Options (2008);
- Core Strategy Further Written Statement (2008);
- Core Strategy Focused Review Regulation 25 Consultation (2011);
- Core Strategy Focused Review Proposed Submission (2012); and
- Core Strategy Focused Review National Planning Policy Framework and 'Model Policy' Consultation (2012).

Main Issue 4.0 – Housing

Whether the amount and distribution of housing land would meet the full objectively assessed need for market and affordable housing in the housing market area as far as would be consistent with the policies of the Framework and whether this housing provision would be deliverable within the plan period.

Issue 4.5

Whether the CSFR is consistent with the 50% brownfield target set in Core Strategy policy CS7?

The National Planning Policy Framework (NPPF) states that plan-making should “*encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.*” It has removed the previous national target, and instead encourages local planning authorities to establish their own target. The CSFR is not required to be consistent with the 50% brownfield target set out in Core Strategy policy CS7. MSDC should take this opportunity to review whether this target is still appropriate.

Table 4.1 reveals that from years 5 to 10 and from years 10 to 15, MSDC will fall significantly short of its 50% brownfield target, even providing for a generous allowance in previously developed land “windfall sites” coming forward. For example, this table states that within Key Service Centres, including Bramford, previously developed land can accommodate 300 homes and greenfield land 450 homes over a 15 year period from the date of adoption. This highlights that only 40% of the land available for housing is previously developed land, significantly below the 50% target set in Core Strategy policy CS7. Given this inconsistency in policy CS7, CEMEX believe that this policy should be revised so that it is more realistic and allows for a greater percentage of greenfield sites.

The proposed increase in the Stowmarket greenfield allocation total by 485 homes in CSFR policy FC2 should also not be to the detriment of the phasing of residential development at other sustainable greenfield housing sites in the Key Service Centres, including Bramford. MSDC should not object on the grounds of prematurity to greenfield locations outside Stowmarket, particularly as CEMEX’s sustainable, deliverable, and developable site at Bramford is available immediately. Therefore, CEMEX find the policy unsound due to its inflexibility.

Issue 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 allocations?

CEMEX's site is a suitable, deliverable and developable greenfield site at Lorraine Way, adjoining the settlement of Bramford. It is located outside of the settlement boundary and could provide a sustainable "urban extension" to Bramford.

As an "urban extension", CEMEX's site at Lorraine Way, Bramford is a more sustainable, deliverable and developable location for housing in comparison with a number of greenfield sites in Stowmarket and should be recognised as such in the CSFR.

Areas to the north of CEMEX's site (Bramford Common) are recognised 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 an area of quiet countryside recreation for water based facilities.

As previously stated in representations, CEMEX consider that 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 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, including mitigation where necessary.

MSDC has assessed that five hectares of the site may be suitable for up to 150 dwellings. This total has been calculated using a density of 30 dwellings per hectare, the figure applied in the SHLAA assessment to all greenfield sites located in Key Service Centres. CEMEX consider this dwelling density to represent a minimum housing capacity for the site. Without evidence to the contrary and as stated in previously submitted representations, CEMEX believe that a dwelling density of 50 dwellings per hectare would also be suitable, increasing the housing capacity of the five hectare site to 250 dwellings.

Notwithstanding the above, CEMEX consider that MSDC's assessment that only five hectares of the site may be suitable for residential development to be unsound. We understand that one of the reasons that the rest of the site has not been considered is due to "safety" and flood risk concerns. At this stage, we have not been presented with further information to establish the detail and extent of these concerns. However, CEMEX consider that these could be mitigated following more detailed investigative work. The current Environment Agency Flood Map (Appendix 1) shows that approximately 17.5 hectares of the site is located outside of the flood zone. CEMEX considers all of this land to be suitable for housing as a sustainable, "urban extension" to Bramford, particularly as the site adjoins this settlement. The part of the site located within the river flood plain, to which the public do not presently have access, could be made

available as public open space and provide a pleasant riverside walk and recreational facility. CEMEX consider all of the approximately 17.5 hectares of land to be suitable for between 525 dwellings (at 30 dwellings per hectare) and 875 dwellings (at 50 dwellings per hectare). As a sustainable “urban extension”, CEMEX’s site is therefore suitable to accommodate a significant proportion of the 450 dwellings allocated to greenfield sites in Key Service Centres. For this reason, CEMEX consider that MSDC’s assessment of the numbers of dwellings is unsound and that the site could provide more than the specified 150 dwellings.

Issue 4.7 Whether the housing allocations, quantity and greenfield/brownfield split in the CSFR are supported by the SHLAA.

CEMEX consider that the SHLAA has not properly assessed its site at Lorraine Way, Bramford. Consequently, the SHLAA does not support the housing allocations, quantity and greenfield/brownfield split in the CSFR, particularly for Key Service Centres, within which its site is located due to this incorrect assessment.

MSDC has assessed that five hectares of the site may be suitable for up to 150 dwellings. This total has been calculated using a density of 30 dwellings per hectare, the figure applied in the SHLAA assessment to all greenfield sites located in Key Service Centres. CEMEX consider this dwelling density to represent a minimum housing capacity for the site. Without evidence to the contrary and as stated in previously submitted representations, CEMEX believe that a dwelling density of 50 dwellings per hectare would also be suitable, increasing the housing capacity of the five hectare site to 250 dwellings.

Notwithstanding the above, CEMEX consider that MSDC’s assessment that only five hectares of the site may be suitable for residential development to be unsound. We understand that one of the reasons that the rest of the site has not been considered is due to “safety” and flood risk concerns. At this stage, we have not been presented with further information to establish the detail and extent of these concerns. However, CEMEX consider that these could be mitigated following more detailed investigative work. The current Environment Agency Flood Map (Appendix 1) shows that approximately 17.5 hectares of the site is located outside of the flood zone. CEMEX considers all of this land to be suitable for housing as a sustainable, “urban extension” to Bramford, particularly as the site adjoins this settlement. The part of the site located within the river flood plain, to which the public do not presently have access, could be made available as public open space and provide a pleasant riverside walk and recreational facility. CEMEX consider all of the approximately 17.5 hectares of land to be suitable for between 525 dwellings (at 30 dwellings per hectare) and 875 dwellings (at 50 dwellings per hectare). As a sustainable “urban extension”, CEMEX’s site is therefore suitable to accommodate a significant proportion of the 450 dwellings allocated to greenfield sites in Key Service Centres. For this reason, CEMEX consider that MSDC’s assessment of the numbers of dwellings is unsound and that the site could provide more than the specified 150 dwellings.

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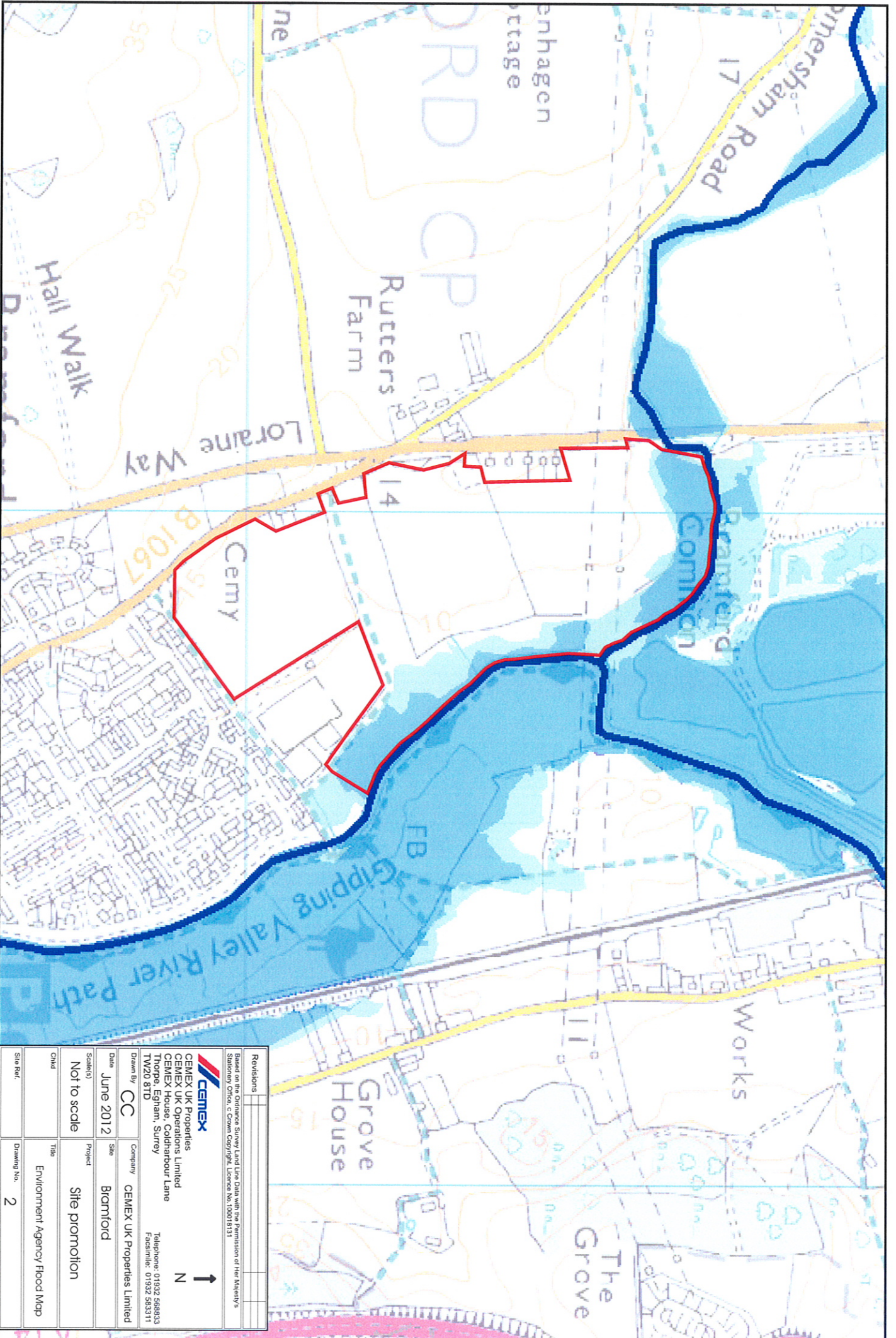
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Appendix 1

Current Environment Agency Flood Map



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Date	June 2012	Company	CEMEX UK Properties Limited
Scale(s)	Not to scale	Site	Bramford
CHD	Project	Title	Environment Agency Flood Map
Site Ref.		Drawing No.	2