

Babergh and Mid Suffolk Joint Local Plan – preferred options consultation (regulation 18)

Eye Town Council response

1. Introduction

- 1.1. This document forms Eye Town Council's (ETC) response to the invitation to comment by BMSDC in their circulation of the draft document on xxxx. The response has been endorsed by all members of ETC under a resolution taken at its meeting held on 18th September 2019.
- 1.2. ETC considers that the lack of a Local Plan, providing a vision of the area's planning needs, has been a significant omission in MSDC's strategic planning. This has led to a number of speculative planning applications, especially in recent years, with the built environment shaped primarily by the interests of developers and land owners, often to the detriment of citizen stakeholder groups. A coherent and up to date plan is therefore long overdue.
- 1.3. ETC welcomes this draft as a key milestone in the delivery of a planning vision for Eye and its locality. It is necessarily a lengthy document and ETC has chosen to restrict its comments to areas of strategy it considers most important and relevant to Eye and its surrounding hinterland in addressing policies SP 01 – SP10 and LP 01-33 and more specifically where these policies are applied to Eye in sections 17.29-17.30.
- 1.4. ETC recognises the need for sustainable growth in and around Eye. By participating in this consultation ETC means to test the consultative nature of section 01.03, recognising the national picture set by the 2019 NPPF particularly in the sphere of identified housing need.

2. Neighbourhood Plan context

- 2.1. MSDC officers will be aware of the work being undertaken by ETC to advance a Neighbourhood Plan for Eye (ENP). This has held a high profile for ETC, an ENP having been proposed in 2014 but not placed before Council Members. The same boundary area for the ENP submitted for designation in 2014 was finally designated in 2018. Extensive consultation on the contents of the draft NP has been undertaken and it is the view of ETC that, in a referendum, its contents would be supported by a majority of the community.
- 2.2. The ENP should be delivered for referendum considerably in advance of the JLP. The wording in section 01.22 should be strengthened. NPs which are close to or at a referendum stage should shape relevant sections of the JLP. ETC proposes that the drafting be amended to 'where a NP has reached a referendum stage or is endorsed by the community through a ballot then sites selected for development will be incorporated into the final JLP provided targets allocated for housing and the principles of the NPPF are met'
- 2.3. Insufficient prominence is given to the importance of NPs in achieving stakeholder 'buy-in'. In the objectives section 03.03 there are a number of items which should refer directly in their drafting to NP influence:
 - (i) delivery of homes 'in the right place' should have an emphasis added that this creditable objective should reflect the need to minimise harmful visual impact, be directed at brown field rather than green field (i.e open countryside or agricultural land) sites and reflect confirmed NP site preferences.
 - (ii) 'in the right place' is repeated in this section and this must also be seen as being informed by sites supported by the people of Eye in the ENP. The emphasis on jobs and economic development is supported.

(viii) The backing and offer of support for communities to develop NPs is welcome. In order to gain public confidence NPs which are delivered and 'made' ahead of the JLP should be reflected in the final JLP

(ix) Eye should be specifically added to the communities cited for support given the amount of development proposed in Eye

3. Comments on sections 4-16

- 3.1. ETC considers that the range of the policies outlined goes some way to meet the needs of a coherent JLP for the future. The research which has been undertaken to assess housing need and demographic trends is informative and broadly supported. There is, however, one significant omission in that no policy specifically addresses intensive livestock production. This is addressed further in ETC's joint response with other parishes but given the visual impact of chicken rearing units and the volume of additional HGV traffic generated this will have a huge impact on the already strained road network through Eye as well as a negative visual impact in the parishes where these are planned.
- 3.2. ETC opposes the designation of Eye as a 'market town and urban area'. This is an inaccurate description of the town and it has been bracketed with Needham Market with a population of about almost three times and Stowmarket with a population of almost eight times that of Eye. Eye, at least in terms of population is far closer to, for example, Debenham. The designation shown on page 35 should be changed to 'small towns'.
- 3.3. In section 09.01 the term 'right location' is used again in the context of 'adapting and enhancing the local environment to modern living needs, creating job opportunities ... and affordable homes to live in'. ETC supports this spatial distribution context but insists that section 09.01 be accompanied by a 'rider' that any development for housing or employment be accompanied by the wording 'Any development will be assessed in the context of the capacity of the infrastructure network, especially roads, to support a development in its proposed location and the balance between the positive impact of economic growth in terms of the amount and quality of employment created versus the visual impact on the environment and quality of life of nearby communities'.
- 3.4. ETC has prepared a NP which meets the housing targets (541) referred to in section 09.03 over the life of the JLP. Eye represents 10.5% of the total population of the three towns bracketed as 'market towns and urban areas'. Eye's proportion of the total of new housing expected to be provided over the three areas is 25%. ETC is not raising an objection to this but submits this as proof that supporting infrastructure has to be concentrated in and around Eye to support this level of housing growth.
- 3.5. This target for new housing is also shown to be ambitious by the fact that it would involve a 59% increase in the number of households in Eye over the duration of the JLP, making the infrastructure comment in 3.3 and 3.4 above even more applicable. As previously stated it is strongly ETC's view that the 'right places' for housing development are the sites in the ENP, selected after community consultation and not purely sites driven by land owner and developer interests. The target is capable of delivery if concentrated around ENP proposals, including the use of the preferred reserve site and supported with a proportional investment in supporting infrastructure.
- 3.6. ETC does not agree with section 9.08 which lays out criteria for site selection for development, concluding that 'sites judged to perform best overall against the above criteria have been proposed in this document'. ETC considers the selection criteria has been

misapplied and in the case of the Tuffs Road/Maple Way site proposed for housing development which conflicts with a decision already made to reject the application by MSDC (see section 4.2) ETC has carried out a higher degree of public consultation in the preparation of its draft ENP than any consultation informing the decision to include the housing sites in section xxxx. The sites proposed in section xxx should be changed to reflect those in the draft ENP.

- 3.7. Eye has been selected as a strategic employment site. ETC supports this concept, subject to transport and other support systems being able to support development in proposed locations, but requests that section 09.17 be redrafted to target high quality employment such as information technology and enterprises which will generate minimal additional HGV traffic using the town centre and local road network. ETC encourages MSDC to seek to attract high quality employment possibly 'overspill' from the Fens on favourable business start-up conditions. This will reduce the amount of 'out-commuting' referred to in the draft as well as redressing the ageing population demographic trend.
- 3.8. Eye's inclusion as a strategic employment site is again referred to in section 09.21 which states that ' (the sites)... mostly have good access to the major road network'. This is not so in Eye. Much of the area designated as employment in Eye under SP05 does not have direct access to the A140 and whilst the position will be somewhat improved by the construction of two roundabouts in the Brome area the capacity and safety of the A140 will remain a threat to sustainable development.
- 3.9. The draft does not pay sufficient attention to improvements required to the A140 to allow safe access for increased traffic levels leaving and approaching Eye. Accepting that the A14 corridor will be treated as a priority, enhanced safety and other improvements should be included as an objective. The A140 does not seem to merit a mention in Policy SP08
- 3.10. Infrastructure covered in section 11 is key to the success of the whole plan from ETC's perspective. The drafting of this section is somewhat idealistic and will not meet Eye's needs. The term 'appropriate level of infrastructure needs to be defined in a specific local context which for Eye must prioritise:
 - Traffic – especially the growth in HGVs being minimised and to avoid the town centre wherever possible
 - Parking provision being enhanced so that occupants of the new houses will use the town centre businesses.
 - Access to the A140 is improved.
- 3.11. The policy in section 11.01 that 'applicants will be expected to demonstrate that existing, planned and/or committed infrastructure is sufficient to accommodate new development proposals' is not strong enough to encourage sustainable economic development. This reduces particularly traffic management to a series of individual applications, supported by often optimistic surveys (for obvious reasons) prepared by developer's agents which when considered individually may look sustainable but when experienced cumulatively certainly are not.
- 3.12. The emphasis should be changed for the Eye area at least to say 'applications for developments will be considered within the context of the traffic management plan for Eye' This is policy 32 from the ENP and ETC undertakes to work with both MSDC and SCC to deliver a workable strategic document. The wording of LP30. 1 should be amended to include as new item (a) 'will be considered in the context of any traffic management plan or

stakeholder research undertaken and in place'. ETC repeats that individual project based transport assessments are not sufficient to deliver the sustainable development referred to in section 16.10

- 3.13 ETC completely agrees with the concluding section 11.05 that 'the provision of infrastructure is fundamental to maintaining the quality of life, the prosperity and environmental credentials of the area'. For Eye and its surrounding area the road network capacity including the A140 is seen as the most important factor when assessing the sustainability of future developments especially those that will add to the already dangerous level of HGVs and other large vehicles using the town centre.

Note: ETC is currently considering an application to SCC for a Traffic Regulation Order, seeking to control numbers of HGVs and other large vehicles using the section of the town centre not currently covered by the existing 7.5 ton weigh limit.

- 3.14 ETC also agrees with the statement in section 11.13 regarding the 'need of improvements to community infrastructure in order to support overall and proposed distribution of growth'. The delivery of an Infrastructure Delivery Plan is welcome 'to ensure that appropriate and sustainable development can be supported'. ETC requests that there should be a formal link between the BMSDC and the Local Infrastructure Plan being prepared for Eye to meet the ambition of the ENP and further economic development. Particularly in the planning of future highways and traffic management the JLP need to be informed by and link to a wider county plan prepared by SCC. ETC expects this to be addressed on SCC's response to this consultation.
- 3.15 ETC broadly supports policy LP06 especially the inclusion that NPs 'may wish to identify specific localised needs for certain types of dwellings where supported by evidence gathered...'. Localised needs have been included in the ENP to meet this criteria.
- 3.16 ETC's position with regard to highways and traffic management planning is further strengthened by the drafting of LP11 – Employment Development. ETC recognises that 'employment growth is critical to the future of communities' However sections 14.03 (iii) is equally relevant to Eye and policy LP11 . 1 c in section 14.06 is absolutely supported when it states that (proposals for employment use) 'must not have a detrimental impact on highway safety' and (must) 'be sensitive to the surroundings, including any residential and other amenity, landscape and heritage assets'
- 3.17 ETC supports the drafting of section 16.14 regarding the absence of proven infrastructure capacity and LP31. 2. These are relevant to current discussions which ETC believes are taking place regarding chicken rearing units to the south and east of Eye.
- 3.18. ETC supports the emphasis on supported and special housing needs in section LP06, affordable housing in LP07 and self-build in section 13.64. The inclusion of a variety of routes to meet future housing needs is also supported including via a Community Land Trust (sections 13.39 and 13.46) A CLT could be advanced by ETC as part of its NP housing implementation proposals
- 3.19. ETC considers that LP 18 is insufficiently strong in its drafting to protect important areas of landscape value. The concluding section 15.27 does not make sense as drafted and ETC proposes 'the JLP will require all planning applications to address how development will protect or enhance the landscape, taking account of its natural beauty, features of archaeological or historic interest and impact on the existing built environment both from

the development itself and traffic and other matters affecting the environment generated by it'

4. Place and Allocations comments (sections 17.29 – 17.30 including LA 20, 21, 22 and 99)

4.1 ETC requests that a section 17.31 be added stating

'The centre of Eye suffers from severe traffic congestion caused primarily by HGVs requiring to use both sides of the B 1117 when navigating the town in any direction. For any development to be considered sustainable traffic growth will be assessed against the level of current use and proposals identified in the Eye Traffic Plan – Policy 32 of the ENP or other relevant document)

4.2. In terms of the land allocations ETC comments as follows:

LA020; Land north of Magdalen St – approximately 80 dwellings: supported

LA021; Land north of Church St (Paddock House site)

This site is subject to detailed consultation between MSDC and ETC. ETC considers that the number of properties proposed is too high on that site but will continue to work with MSDC to find a mutually acceptable design solution between the 12 homes proposed in the ENP and the 22 properties tabled by MSDC in the latest formal design proposal. The green space is also to be retained to comply with sections 16.01 and 16.02 of the JLP. Otherwise this site is supported for housing development.

LA020; Land north of Maple Way – approximately 150 dwellings.

This site was rejected by MSDC's planning committee on 20th March 2019. It is currently the subject of an appeal by the applicant. ETC awaits to see if the appeal covers the application in its latest form with access from Tuffs Rd via Century Rd only, other than for emergencies where Maple Way would be used.

ETC opposes the inclusion of this site for the reasons set out in its response to the application and submission for the appeal. The reasons for this and for the preference of another reserve site being considered in preference to this one are tabled also there.

ETC requests that this site is removed from the JLP and replaced, if necessary to achieve numbers, by the ENP reserve site South of Eye Airfield offering up to 174 homes.

Should one or possibly more of the sites proposed for development for housing in the draft ENP fail to become available or viable replacing these with the ENP's reserve site above will allow the plan to deliver the 531 home target. It will also build on the concept of developing housing on the airfield which MSDC has previously called 'a logical north westward extension' of the town.

LA099 – Land at Eye Airfield (employment use)

Supported but subject to the comments regarding access and capacity of the existing highway network including planned improvements and being targeted at high quality employment which generates a low incidence of HGV movements.

5. Summary

ETC welcomes this draft JLP and hopes that section 1.03 reprinted below is genuine and will not simply be tokenism.

This consultation is your opportunity to identify the planning issues that you think the Plan should address in your communities and comment on possible ways that the plan might address these important issues in your communities. The more information you can respond to, the greater your opportunity to shape the future of the area.

ETC will judge the extent to which this has been met by the following being included in the next draft:

- Eye to be re-designated as a small town and not 'a market town and urban area'
- New sites proposed for housing development are amended to accord with the proposals in the ENP
- A new policy be added specifically to address intensive livestock production and its impact on the environment including increased HGV movements
- Recognition that traffic and highways management is a high priority for Eye and have a transport and highways management plan for the BMSD region linked to a wider SCC plan to include a safety appraisal of the capacity of the A140
- As part of the above end reliance on project based traffic impact assessments to determine planning applications
- Target economic and employment development at sectors which do not generate a significant increase in HGV traffic
- Use the ENP to shape the specific policy applications to Eye once the plan is 'made'

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