Dear Sir/Madam

Representations to Suffolk Coastal Local Plan First Draft
Land at and surrounding Woodbridge Town Football Club, Woodbridge

On behalf of our client Hopkins Homes Limited we wish to make representations to the current Suffolk Coastal Local Plan First Draft consultation following on from our previous submissions made to the Issues and Options Local Plan consultation in October 2017. Detailed representations have been made in our accompanying letter reference GA/EW/05017/L0008 in respect of the Local Plan housing number and a range of general policies. This submission relates specifically to Land at and surrounding Woodbridge Town Football Club, Woodbridge which has been omitted from allocation in the draft plan.

As the Local Plan is expected to be submitted for Examination after 24th January 2019, it will be required to be fully compliant with the revised National Planning Policy Framework (NPPF) in accordance with paragraph 214. Reference is made to the revised NPPF throughout the representations made where relevant and regard has been given to the tests of soundness for examining Local Plans as set out in paragraph 35.

Policy SCLP12.1 of the Plan sets out those settlements which have a designated Neighbourhood Plan area and provides each with an indicative housing number with Neighbourhood Plan groups in the production of Neighbourhood Plans expected to identify sites to deliver these figures. Woodbridge is a Market Town which has a Neighbourhood Plan area approved. However, in light of the fact that the Town Council has determined that they do not wish to progress with a Neighbourhood Plan at the present time, the Plan fails to provide an indicative housing number for Woodbridge.

Despite the elevated position of Woodbridge in the Settlement Hierarchy, the town has failed to benefit from any allocation-led growth for a significant period as the same approach was taken in the Site Allocations and Area Specific Policies DPD adopted in January 2017, despite the work having ceased on the Neighbourhood Plan at this time. As a result, Woodbridge has significantly under-delivered against the level of housing that...
would be expected of a town of its size and importance in the context of the District, accommodating incremental infill growth only.

The strategy leaves Woodbridge, the largest market town in the District, with no direction for growth and fails to positively seek opportunities to meet the development needs of the settlement. This specially is contrary to paragraph 65 of the NPPF, which states that strategic policies should set out a housing requirement for designated Neighbourhood Areas. Accordingly, the Plan is not consistent with national planning policy and therefore is unsound.

As set out in the accompanying supporting representations reference GA/EW/05017/L0008, it is considered that there is a clear and defined significant housing shortfall in the draft Local Plan and in the interest of bolstering the housing supply of the District to address objectively assessed needs over the plan period in line with the presumption in favour of sustainable development as required by the NPPF, the Plan should be positively seeking to allocate additional sites for housing development, particularly in the higher order sustainable settlements located along the A12 corridor such as Woodbridge which has a longstanding lack of housing delivery as detailed above. The accompanying representations have also raised concern about the Local Plan’s lack of direction for Neighbourhood Plan areas and have suggested that sites, particularly those of a strategic nature, should be allocated within Neighbourhood Plan areas to provide certainty that there will be a sufficient supply of land to meet the housing needs identified.

Table 3.5 of the Plan sets out an indicative housing contribution which Woodbridge is 3.5%. Applying this percentage figure to our calculation of what we believe is the actual assessed housing need in the District over the Plan period (up to 14,860 dwellings) the proportionate housing requirement in Woodbridge should accordingly be increased to around **520 dwellings**. Although given the historic under delivery, this should clearly be uplifted further.

Woodbridge is one of the most sustainable locations for growth along the A12 corridor and we recommend that the level of growth allocated to the town should be increased given the past under delivery and clear identified need for further housing in the short term to meet objectively assessed needs.

**Land at and surrounding Woodbridge Town Football Club**

Hopkins Homes has an interest in land at and surrounding Woodbridge Town Football Club. Pre-application discussions and public consultation events have been held in respect of the redevelopment of the land for approximately 95 dwellings which would involve the relocation of the football club and St Audrys Sports and Social Club to the derelict Notcutts nursery on Yarmouth Road, Ufford and a small enabling development of 12 family homes at the current St Audrys site. Hopkins Homes are still actively pursuing the site and are looking to bring forward a planning application in due course.

The layout the subject of previous public consultation and pre-application discussions is shown below:
The site is in a sustainable location with good access to local services and facilities and public transport options. It is adjacent to existing residential development and as such, can easily be integrated into existing communities. The site, which is not at risk of flooding, is located to the east of the A12 and is not constrained by either the AONB or the Special Landscape Area. Its redevelopment should therefore be encouraged.

The site can provide significant housing (both market and affordable), and is capable of being delivered in the short-medium term. As such we consider the site to be one of the most sustainable locations available to meet the growth needs of Woodbridge and recommend that it is allocated for residential development.

**Change sought:** A policy should be added to the Plan to define Land at and surrounding Woodbridge Town Football Club as a strategic housing allocation for at least 100 dwellings.

We trust that these comments will be given the due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours faithfully

Geoff Armstrong
Director
Armstrong Rigg Planning