Hearing Statement for the Examination of the Suffolk Coastal Local Plan

Prepared and Presented by Mr. & Mrs. William Miller

This hearing statement relates to paragraph 3.80 of the Inspectors Initial Matters Issues and Questions. The paragraph covers Policy SCLP12.60 Land adjacent to Farthings, Sibton Road Peasenhall and asks whether the allocation of land for housing within an area of Flood Zone 2 is justified in terms of the sequential test.

1. The Local Plan clearly states under 2.26 No adverse Impact, No Harm. And it must be Justified and Appropriate in ALL aspects.

2. Our Submission is in regard to the inclusion of the above site as against the several other clearly, more suitable sites within the village. And the simple question of the Council’s failure to answer fully, the question of soundness and justifiability against the other dismissed sites.

3. The mere fact the Inspector at such a late date within the planning process has had to ask the very basic question “is it justified to build housing on a known Flood Zone 2 site”. In my mind this should set off alarm bells as to whether the Council has completed the necessary due diligence and consultation as to the soundness and justifiability of this part of the plan.

4. With some very basic knowledge and the help of Google. I was able, within five minutes, to find the Department of the Environment's own website under the heading, 'Flood Map for Planning’. Clearly showing the site to be on a level 2 Flood Risk. (Appendix 3 & 4)

5. It clearly states in the Environment Agencies own advice for this site, planners must complete a flood risk assessment. I would find it highly strange if a positive risk assessment was now produced at such a late stage, as again, it would just show the lack of basic consultation.

6. At the Saxmundam Public Drop in Session on the 31st July 2018, one of the planners (Mr Brown) was completely unaware the site was a flood risk Zone 2 until this was pointed out to him. He did make a note and stated with this new information, he would take this back and look at it again. I come back to my initial premise, how did this site slip through to you, The Inspector, without the completion of a sequential test report?

7. In my submission the flood risk assessment should have been identified and completed at the beginning of the initial site allocation process and therefore discounted as unsuitable.
**Under the National Planning Policy Framework**

158. *The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.*

7. In addition the Government's Flood Information Service maps (see attached) clearly shows this site to be well within a level 2 flood zone and if this site was to be built on there would be far reaching consequences and increased impact on the bordering higher risk sites.

8. There are only sixty eight river monitoring stations in the whole of Suffolk one of these is within a short distance, less than 200 meters from this site located in Sibton. This appears to have also been missed by the Planners. (Appendix 1)

9. We know Sibton Parish Council has not been involved in any consultation regarding the new site, or been part of any request for information regarding any flood risk assessment sequential test. Even though, the future impact on their Parish could be catastrophic.

10. At a recent Parish Council meet a local Councilor and the land owner of the Grade 2 listed Sibton Abbey site gave an update from the recent English Heritage consolidation works to the Abbey and Bridge. He stated the river Yox, which flows directly past the site, was going to be returned to its original path as the river was undermining the banks on which the Sibton Abbey sits. If any development was allowed to take place in the vicinity it could have a detrimental impact on this historical site.

11. It is well known locally there are several other more suitable alternative development sites within the village, which have no risk of flooding. Many of these were included in the first draft of the Local Plan and the vast majority supported for inclusion by the Parish Council. Inexplicably, none of these sites were included in the final draft.

12. To identify one site in particular, the former Peasenhall Primary School in Hackney Road. It is actively under consultation to be sold and the County Council, the owner of the site, is currently seeking permission from the Secretary of State for the necessary authority.

13. This site is brown field and fulfills the requirement as a **reasonable alternative** site required under the sequential test of identifying another site within the location. Making it far more justifiable. This site is not on a flood risk zone and would more than accommodate any future need for housing within the village. It, is going through the open and honest consultation procedures unlike the land in question SCLP12.60 Land adjacent to Farthings. (See attached appendix 4 & 5 Suffolk CC letter and plan).
14. In conclusion, the allocation of this site for housing development fails the soundness test on the grounds of not being justified in terms of the sequential test (flooding) and also on the grounds of there having been:

- Insufficient public consultation on the inclusion of the site within the final draft of the plan.

- And fails the sequential test by not considering other sites

This site was deemed, along with all the other sites at the beginning of the process as being unsuitable, after the initial consultation. This site SCLP12.60 was not included in the first draft of the plan and not therefore been subject to any proper or meaningful public consultation.

Nature does not adhere to boundaries created by man. For the Council, to rely on an arbitrary line drawn on a map, showing a site to be of a lower risk would be at least naive if not, completely unjustifiable.
DOE website Flood Risk Warning Area showing the bigger impact area.

Appendix 1
Flood map for planning

Your reference: chaple cottag
Location (easting/northing): 635888/269513
Created: 29 Jun 2019 3:19

Your selected location is in flood zone 2, an area with a medium probability of flooding.

This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency’s standing advice for carrying out a flood risk assessment (see www.gov.uk/guidance/flood-risk-assessment-standing-advice)

Notes

The flood map for planning shows river and sea flooding data only. It doesn’t include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Dear Occupier

Consultation – Peasenhall Primary School – Hackney Rd Peasenhall, Suffolk, IP17 2HS
Saturday 6th January 2018 – 16th February 2018

Suffolk County Council is consulting on a proposal to dispose of the former Peasenhall Primary School site in Hackney Rd and to use the proceeds to extend the Yoxford & Peasenhall Primary School in Yoxford. Peasenhall Primary School closed in December 2016 when all the remaining pupils transferred to the Yoxford site.

Notice is hereby given that Suffolk County Council intend to apply to the Secretary of State for Education to dispose of approximately 7,765m² of playing fields at the former Peasenhall Primary School site under Section 77 of the School Standards and Framework Act 1998. Subject to the outcome of this consultation and Secretary of State approval it is proposed that the land is sold and the proceeds used to enhance the facilities at the Yoxford & Peasenhall Primary School.

You are able to view relevant documentation and complete an online comment form or download a comment form at www.suffolk.gov.uk/consultations from Saturday 6th January. Alternatively, you may wish to write or email your comments to Schools Infrastructure Team, Suffolk County Council, Endeavour House, 8 Russell Road, Ipswich IP1 2BX or schools@suffolk.gov.uk by 16th February 2018.


Yours sincerely

Sonia Docherty
School Infrastructure Manager
School Infrastructure

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