From: Neil Burton

Sent: 15 January 2016 13:31 **To:** Programme Officer

Subject: LDF - Examination 55/1227 - personal

Dear Clare,

I note the consultation on the Council's work expires later today. I am not sure whether the consultation includes the Council's answer CC66/Response to Question 6, but if it does I attach my comments below for consideration.

I believe that the Council's updated Sustainability Appraisal (extract below) is based on some misunderstandings. My comments are in red and underlined and embedded within the Council's original text below.

The impact of this is that I believe that the scoring for Site 55/1227 should be amended as follows and Site 55/1227 should be the preferred site for Southery:

- Highways & Transport "+"
- Economy B Food Production "o"
- Landscape & Amenity "o"

55/1227 – These two sites are within the same ownership and adjacent to one another, they are assessed together as the Local Highway Authority state that a combination of these two sites is their preferred arrangement rather than one of the sites alone, in order to gain a potential access. As previously the sites were considered separately and the achievement of safe access was considered unattainable by the Local Highway Authority. Two access arrangements may be achievable, the Local Highway Authority has stated that improvement to the footway and the junction with the B1160 would be required (I believe this Highway's comment only related to the first access arrangement which uses Highway Land and not the second alternative access arrangement that is all within the ownership of the promoters – see below) . One of the access arrangements relies upon land outside of the ownership of the land owner of Site 55/1227 (no third party land is required for the actual access, but a very small strip of a few cm of Highway with amenity use is needed for part of the visibility splay for the first access arrangement, but not the second accesss). This land is Highway Land that currently has amenity value for the Parish, and would need to be made available. Further discussions would therefore need to take place to secure that visibility between the land owner/agent of Site 55/1227, Southery Parish Council and the land owner. The second access arrangement utilises land within Site 55/127 and does not rely upon the use of the Highway Land. Accordingly the site scores '#' (dependent upon implementation) for the factor 'Highways and Transport' (we suggest that Highways & Transport should score at least "+" on the basis that Highways have previously advised this was their preferred option and a Highway & Transport consultant has advised that safe access can be achieved. Also, this site is located right next to the main bus-stop in the village and the site could link two key public spaces in the village - the Werehen and the playing field) . The Sustainability Appraisal identifies negative impacts for the factors 'landscape & amenity' as development of Site 55/1227 would result in short, medium and long distance views of the countryside from a relatively central location being lost, diminishing the rural character of the settlement (we suggest that this should score "o" on the basis that the site is surrounded by residential development and is partly hedged so does not materially impact views). Development here could also have an impact upon the amenity land that is currently used by the Parish (this is a misunderstanding in that neither access will result in any loss of amenity land see above, in addition, the site could be developed to enhance the size of the public open space and link two key existing current open spaces in the centre of the village). There is a small element of the site that could be classed as 'brownfield' this comprises residential properties that appear to currently be in occupation and a number of storage buildings, however the majority of the site is 'greenfield' classified as Grade 2 Agricultural land, and so Site 55/1227 has been assessed accordingly with the negative scoring in the factor 'economy B food production' (55/1227 is the only promoted site in Southery that includes some brownfield land and, therefore, should at least score "O" in line with FWO4 The Approach to Brownfield Sites Nov. 2015 - especially if other sites are all greenfield / grade 2 agricultural land) The site is centrally located and therefore close to village services, hence the positive score for this factor, although some improvements to footway would be required (we believe that Highways only mentioned this in relation to the first access arrangement and would not be required for the second access). Site 55/1227 is located to the east of Lynn Road close to the centre of Southery. The site is not subject to flood risk (zone 1) and there are no known heritage issues.

Thank you.			
Kind regards			
Neil Burton			

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