

**Chapter 5: Consideration of Alternatives**

**Land off Duke's Park, Woodbridge**

**ENVIRONMENTAL STATEMENT**

November 2015

## 5.1 INTRODUCTION

5.1.1 The EIA Regulations require applicants to provide an outline of the main alternatives studied by the applicant and an indication of the main reasons for the chosen proposal, taking into account the environmental effects. In considering alternatives, there are a number of aspects and scenarios to be taken into account. Examining alternatives should involve the consideration of alternative sites for the development, where this is feasible. It should however, also examine alternative design and mitigation approaches and where relevant alternative processes and technologies. This could include alternative approaches to construction activities.

5.1.2 Consideration of alternatives is divided into two headings

- Alternative Locations;
- Alternative Development and Design.

## 5.2 DO NOTHING APPROACH

5.2.1 Whilst Suffolk District Council state that they are able to demonstrate a five year housing land supply (Five Year Housing Land supply Assessment, June 2015) Gladman contend that this is a robust assessment. A number of recent appeal decisions in SCDC have concluded that the Council is unable to demonstrate a five year supply. The first is Haven Exchange, Felixstowe, Suffolk (Ref APP/J3530/W/15/3011347), and the second is Melton, near Woodbridge (2015) (Ref: APP/J3530/A/14/2225141). Furthermore, the Council is required to undertake a review of its objectively assessed housing need before the end of 2015. This is likely to be significantly higher than the current housing target. Gladman believe the Council therefore need to deliver new housing as a matter of urgency.

5.2.2 Subsequently the do nothing approach would not help Suffolk Coastal District Council's obligation to provide sufficient housing sites over the plan period and would contribute to the detrimental social and economic effects that a lack of available housing can have on an area.

## 5.3 ALTERNATIVE LOCATIONS

5.3.1 The consideration of alternative sites is not always straight forward, as often it can be difficult to determine and appraise sites beyond the control of the applicant. The applicant has not considered any alternative locations for development as the application is restricted to the landowner's title deed.

5.3.2 Notwithstanding the above, it is important to note that if alternatives had been considered, it is evident that the loss of greenfield land will be necessary to meet the substantive housing need within the District. In addition, the application site is one of the few areas in and around Woodbridge that could accommodate significant housing growth due to a number of significant constraints including the Special Protection Area (SPA), Special Landscape Area (SLA) and the Area of Outstanding Natural Beauty (AONB) within the wider landscape.

## 5.4 ALTERNATIVE SITE AREA

The site is currently well contained and could not be extended further than the red line of the application site. A smaller site area would be unviable and difficult to achieve due to the current site constraints including access, topography, EAOW project and open space requirements.

## 5.5 ALTERNATIVE DESIGN APPROACHES

- 5.5.1 An iterative design approach has ensured that the proposed development responds to physical features on the ground, immediate site context and the wider context in which the site is located. Several revisions have been made to the Framework Plan to help ensure that the opportunity presented by the site to deliver new housing is maximised whilst being mindful of the identified constraints and opportunities to enhance features of the site.
- 5.5.2 The location of public open space on site has been fully informed by the LVIA and the Ecology Assessment submitted with the application. For example, the public open space will form a spine through the middle of the site, dividing up the development areas into parcels. Proposed structural planting will ensure that an area of separation is maintained adjacent to the properties located along Top Street and the AONB to the south, this will ensure the quality and the character of the AONB, Martlesham, Riverside and the Deben Estuary are maintained.
- 5.5.3 For the purposes of considering the environmental implications and effects of the main alternatives, the following development scenarios and approaches are considered to be representative. These have either been considered by the developer, or are other alternatives that potentially exist for the site. It is not intended to be an exhaustive list and it is recognised that there are many other alternatives that could be considered for the site. The main alternatives considered are as follows:
- Alternative Site Based Uses
  - Reduced Site Area
  - Increased Site Area

## 5.6 ALTERNATIVE SITE BASED USES

- 5.6.1 The proposed development is considered to be the optimal use of the Project site.
- 5.6.2 The proposals include the development of a small convenience store, which would be the only appropriate retail use given the Project site is in an out-of-town location and would, therefore, fail the sequential test for large scale, town centre uses such as retail, leisure and commercial uses as required within the National Planning Policy Framework (NPPF). A comprehensive large scale retail/leisure development in this location would have a detrimental impact on the vitality of Woodbridge Town Centre. It would also lead to unsustainable travel patterns.
- 5.6.3 Whilst there are some small scale employment uses to the south of the site, given the pressing need for housing in the area the use of the application site for employment purposes would not represent the most efficient use of the land. Moreover, the site is located immediately adjacent to an existing area of residential development, so there would likely be significant conflict should other larger scale business uses be introduced.
- 5.6.4 In order to deliver the growth identified for Woodbridge and the District as a whole, a willing landowner is integral and the application site is not constrained by any ownership or land assembly issues. The use of compulsory purchase powers to facilitate the development of the Project site for an alternative use is considered to be improbable for reasons of cost and practicality.

- 5.6.5 There is clear policy support within the adopted Core Strategy to provide strategic housing growth in Woodbridge and due to the numerous constraints to development, this development will have to come forward to the south of the Town if it is to meet its housing needs over the plan period.

## **5.7 SUMMARY**

- 5.7.1 The applicants have considered alternative uses for the site in accordance with the EIA Regulations, however, it has been demonstrated that the proposals represent the optimal use of the land and would clearly contribute towards the supply of deliverable housing land within Suffolk Coastal District.