

## BREDFIELD NEIGHBOURHOOD PLAN EXAMINER'S QUERIES (NOVEMBER 2019)

Dear Laura

Many thanks for your replies to my queries.

The documents submitted in relation to Policy BDP9 go some way to addressing the issues I raised and in particular it is reassuring to know that a site assessment has been undertaken for the proposed new employment area referred to in Policy BDP9. However, I am still concerned that the additional consultation carried out locally before submission and the submission documents did not fully address the implications of Policy BDP9. Thus those commenting on the submission plan did not have sight of significant important evidence relating to this policy.

More specifically, the omission of the site evaluation for the proposed employment land from the submission documents meant that this significant extension of the settlement boundary was not supported by the same evaluation process as had been applied to the other proposed extensions. The submission documents therefore do not meet the requirement in Planning Practice Guidance that "Proportionate, robust evidence should support the choices made and the approach taken".

While the SEA does refer to the additional employment land in association with The Forge site in the evaluation of options and in paragraphs 5.19, 5.29 and 5.36, the environmental impact of the allocation of new employment land is not assessed in the same level of detail as the housing sites. The maps on page 9 of the SEA do not show the potential employment site and the tables on pages 11-16 and the summary table on page 17 do not include an evaluation of the proposed employment land. As the reasoning for the need for SEA was that it related to the allocation of small areas of land this omission means that the Environmental Report is not complete. While the references in paragraphs 5.19, 5.29 and 5.36 touch on the effects, this is not a full assessment. For example there is no reference under the heading of "health and wellbeing) to the effect of the proposed employment land on neighbouring residential development. In its present form therefore the Environmental Report does not fully assess the environmental impact of Policies BDP 9 and BDP15.

In these circumstances, the following steps are necessary to ensure that these concerns are addressed:

1. The updating of the SEA to ensure that the environmental effects of the proposed employment land are fully evaluated. This would require the identification of the site of the employment land on the map on page 9 in a different notation, a separate evaluation page for the proposed employment land making clear that this would be in association with the development of site 694 for housing, the inclusion of the employment site in the summary table on page 17 and in the non-technical summary and clear reference to the environmental effects of the development of the proposed employment land as well as site 694 in the evaluation of options on pages 19-22.
2. The publication for consultation for a period of 6 weeks of the site assessment for the proposed employment site, and a drawing showing the potential access to it and the updated SEA.

I realise that this will cause some delay, but without these steps I am not satisfied that the Plan meets the basic conditions.

If you need any further clarification of the steps required, please let me know.

Kind Regards

Richard